# **CRMP: Public Comments**

# Submitted during public scoping period 10.28.2014 – 12.04.2014

Posted Online: May 23, 2014

**Correspondence ID:** Project: 33691 **Document:** 55915

Received: Nov 02 2013 11:59:29

**Correspondence Type:** Web Form Correspondence: Topic Question 1:

I like the choices, but I do not like Alternative A, removing historical items.

I like B best. The appeal of Isle Royale to me is trekking through the wilderness then stumbling upon historical relics. These must be preserved.

Comments:

Correspondence ID: Received:

Project: 33691 55915 Document: Nov,08,2013 00:00:00

E-mail

Correspondence Type: Correspondence:

> You need us! We are the people that have lived on Isle Royale over the last 100 years and hope to be able to continue our heritage and pass it along through cultural programs, presentations and occupancy of our homesteads and homes thus keeping an ancestral living presence on the Island.

Why do I say you need us? Because, you alone cannot develop, present and maintain all the services needed to provide a comprehensive cultural plan that is not only warranted but desired by many visitors to the Park.

As evidence of this I ask you to look at what has happened at Crystal Cove. You got off to a great start but because there is no outside the park organization to assist in the development and planning of the site, it has stagnated and has even begun to deteriorate

Another site that can be looked at is Edison Fishery. Again, great start in putting a plan together to reconstruct the site. I complement the Park on having the initiative to preserve a unique piece of history. However, there is once again no independent organization working with the Park to ensure a viable plan going forward. As a result, buildings have begun to deteriorate and a credible interpretive program is stagnating.

Whats missing with the above sites is a strategic plan involving the Park resources working in conjunction with an outside organization that could provide the motivation and financial means of assisting the Park in the development of the site and programs. With a coordinated strategic plan involving site development, interpretive programs and continued long range maintenance as well as fund raising capabilities your cultural resource programs can prosper and maintenance of the cultural sites could be assured.

Who or what organizations are capable of assisting in this manner? I can think of two that are ready to go, Isle Royale Family and Friends Association (IRFA) and Johns Hotel Historical Point Association. Both 501C3 organizations have previously demonstrated their ability and willingness to be involved in assisting the Park in developing long range cultural plans through significant historical data, valued artifacts and living heritage. Im sure there are other organizations just as willing if packaged correctly.

What do I mean packaged correctly? There has to be some give back on the part of the Park organization. A true partnership is a two way endeavor aimed at achieving a common goal. These organizations are ready and willing to be active, thoroughly involved participants. However, with the

current structure of yearly renewable Voluntary In The Park permits there is little incentive for these organizations to contribute substantial amounts of money, material and manpower. The Park needs to arrange long range cooperative ventures.

What the Park, through the Cultural Resource Management Plan, needs to implement is a true partnership with organizations that have the motivation, knowledge, means to raise funds and the stamina to develop and manage historic sites on Isle Royale. Its time to take a different course of action from your predecessors, who through miscalculations, greed and lack of desire to cooperate with willing participants, have lost valuable historical assets as well as squandered forever personal living histories of lifestyles that seem to be so valuable to society today. Dont make the same mistakes that were made in the past years of Park mismanagement. You have an opportunity, take advantage of it. This is not a new idea for the National Park however it is a new idea for Isle Royale Park management.

The Park, through the Agreements Handbook, already has the legal means set up to achieve this type of partnership. The partnerships or agreements can be written for the arrangement to continue for several years thus encouraging Association full participation. Control would be maintained by the Park with the Associations having the freedom to manage and develop the cultural resource in conjunction with the Park staff and overall cultural plan, so as to benefit Park visitors. If, after the agreed upon duration of the agreement, the assigned Association performed satisfactorily, the agreement could be continued with the same Association thus ensuring consistency and longevity to the project. As Park staff changes through the years the responsible association would be able to continue on with the overall objective established for the historic site. This may or may not be possible if only Park administration of the site continued. But, with an independent organization at the helm any volatility within the Park staff would have minimal effect to the historic site and long range cultural plan.

My objective in writing this comment is to ask that as the Cultural Resource Management Plan is developed, serious consideration be made to include agreements language which will allow specific type of Associations access to long term agreements in developing certain historic and culturally sensitive sites. Along with these agreements specific objectives, i.e., preservation, interpretive programs, long term maintenance and coordinated team involvement should be spelled out as to the Associations charter of operation.

Park personnel, naturally, come and go. VIPs are active this year but not next. Park funds are sometimes available but not always in a timely manner and then are extremely limited for specific ventures. What is needed is consistency in the development, reconstruction and continued maintenance of historic structures and programs. Agreements with reliable, proven and stable Park activities related Associations would fill the void and ensure the stability of historic sites on Isle Royale.

Consider Partnerships or Agreements verbiage to be included in the CRMP.

Thank you for your time,

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3 **Project:** 33691 Nov,10,2013 08:32:06 Document: 55915

Correspondence Type: Correspondence: Nov,10,2013 08:32:06 Web Form

Topic Question 1:

I like the draft alternative concepts. I think they cover the alternatives quite well. I would like to see a clearer description of potential funding sources for each of the alternatives, though, so that we might evaluate the alternatives with that information in mind. Alternative A makes a clear statement about funding coming from "traditional means through NPS project funding and staffing." The other alternatives are not so clear, if they mention it all (Alternative D does not). The funding mentioned in Alternative B makes it sound as though additional funding will only be sought for research or planning. It is suggested that the costs associated with Alternatives B and C would be shared with partners, but it could be more clear. Also, I think it's worth mentioning, even though it is an issue outside the scope of this planning process, that it is a sad irony that we are discussing how to best protect and preserve the story of Isle Royale's human history, yet there is no plan to renew or extend special use permits for summer residences and fish camps of Isle Royale families. Today's families are a living legacy of a chapter in Isle Royale's history. It's too bad the government cannot accommodate them.

# Topic Question 2:

Though I agree that the maritime nature of Isle Royale is a major theme in its history - - one that runs throughout everything else, I like Alternative B for its emphasis on "the entire scope of human history" on the island.

Topic Question 3:

No

# Topic Question 4:

As mentioned in my answer to Question 1, I would like to see the government preserving the human connection to Isle Royale by renewing or extending special use permits for families with summer residences or fish camps on the island. I think this is an invaluable tool for building lasting partnerships and it's the right thing to do for people who sacrificed part of their family history so that we might all enjoy the island.

Topic Question 5:

None

Comments:

Correspondence ID:

4 **Project:** Nov,12,2013 10:11:37

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Received: Nov,12,2013 1

Correspondence Type: Correspondence:

Web Form Topic Question 1:

Each of the proposed plans have some merit. I like both B and C in most ways and would like to see a combination of some parts of each of the plans to be implemented.

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Topic Question 2

Alt B seems to be the most flexible and open approach to the planning process.

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# Topic Question 4:

I think a commercial fishery demonstration should continue. Also any buildings and docks that are in serviceable condition should be maintained for the use by research teams, the park service and safe havens in emergency situations. If the docks and buildings are removed then at least a replacement dock should be built.

# Comments:

Chippewa Hbr works as an example of how the Island has changed from private ownership of commercial fishing and small resorts to a wilderness park throughout. I knew the Johnson family of commercial fisherman there and was sad to see their era come to an end but in the interests of preserving Isle Royale for everyone it was a good transition. Removal of the Johnson's buildings and docks along with the new dock and shelters made Chippewa a better place for the public to use. Hopefully this example could be a model for future facilities for public use.

Keep Isle Royale a wilderness but be sure to key on the users being able to access the Island and continue to provide basic trails, docking and shelters for all the users.

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5 **Project:** 33691 Nov 13 2013 19:52:16 **Document:** 55915

Received: Correspondence Type: Correspondence:

Web Form Topic Question 1:

1. This is not a "like" for the alternatives, but for the "actions common to all alternatives." Specifically, I like that the slate will be wiped clean of existing life lease extensions, special use permits, and volunteer agreements.

As to the alternatives, the written presentation of them is so general and abstract that it is hard to know what the implications would be. Specific hypothetical examples would certainly have helped. To the extent that I grasp the focus of them, it seems like each is an extreme: A is a "minimal" approach. B is a "vibrant," apparently maximalist approach. C focuses on maritime. D focuses on archeological resources. Why is there no middle ground alternative with some of each?

I would be especially nervous about Alternative C's emphasis on "partnerships, permits, and agreements," which sounds to me like an outsourcing of interpretation and (?) even maintenance. And though it's hard to tell for sure from the description, B also sounds like it envisions heavy reliance on "partners." I could foresee the current mess of leases, permits, etc. being replaced with an even more entangled situation.

# Topic Question 4:

4. As I said in my comments in the first round, I am disturbed each time I visit the lodge areas at Windigo and Rock Harbor that their historic landscapes have been allowed to deteriorate.

Now because of the reluctance to control and remove trees and shrubs, the areas are completely overgrown with thick vegetation. Please look at historic photos and notice how different it is from today. I contend that an important part of interpreting the lodge era and presenting a taste of that experience is to reestablish a semblance of that open, park-like setting. It wasn't called "Park Place" for nothing.

# Comments:

Correspondence ID: Received:

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Correspondence Type: Correspondence: Nov,15,2013 07:38:18 Web Form

Topic Question 1:

I like the emphasis in several of the alternatives on partnerships. Given the current level of funding for parks, very little can be done to preserve and improve the cultural resources without funding from outside the system.

I like the commitment to increased inventory of ethnographic and archaeological resources too.

I don't like the neglect of cultural resources in wilderness-designated and potential wilderness areas. Almost the whole island is so-called wilderness. As someone who does appreciate the serenity and beauty of the island, I do not think preserving old cabins, mines, fishing establishments, lighthouses, etc., in any way compromises the wilderness experience on the island.

I also don't like the "themed" alternatives that preserve one kind of resource over others. The emphasis should be on expanding the variety of experiences available on the island so as to expand the visitor base and support for the park.

# Topic Ouestion 2:

Alternative B is the only one I would support. It emphasizes "a vibrant program of partnerships," and it manages the "full range" of cultural resources on the island. The island has a complex history and many things of interest to a broad range of potential visitors, and none should be prioritized over others.

Some of the really good ideas in alternatives C and D could be pursued under alternative B if partnerships were vigorously pursued. I like the ideas of culture camps, re-enactor programs, guided tours, and university and tribal field schools.

# Topic Question 3:

Currently, the options for lodging for people who want to spend time on the island are limited. If one doesn't want to camp, there is only the Rock Harbor Lodge, which is more like a cheap motel than a lodge, and housekeeping cabins at Rock Harbor (which are okay, though not as attractive as the alternatives available in many other national parks). It was a bad decision to tear down the lodge at Belle Isle and other accommodations. I like the idea mentioned in alternative C of lighthouse overnight accommodations, and I wonder if some of the personal cabins could be made available in the same way. A nicer lodge at Rock Harbor and a lodge and housekeeping cabins at Windigo and on Belle Isle, which historically offered visitor accommodations would open the park to a wider range of visitors.

Also, expanding ways of getting around on the island - more boats to various sites - would allow less agile and older visitors to see more of the island.

# Topic Question 4

Lighthouses - because they are really popular and interesting and attract visitors. Personal cabins and old lodges that can be salvaged, as they give a wonderful sense of the kind of vacation accommodations that people used to value. The Edison Fishery, which used to have resident interpreters and could have again.

Topic Question 5:

Isle Royale is a jewel of a park - not like any other in the park system. Enabling more people to see and enjoy it should be the priority.

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Letter

Correspondence: 1. I like the ability to review 5 different plans.

- 2. I like alternative Plan B, because it encompasses more aspects of preservations.
- 3. [No answer]
- 4. I would like to see preservation of fishery building and restoration of one or two reflecting the day when operational
- 5. Restoration of buildings would enable visitors with activities during bad weather days.

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- 1. The preliminary draft seems to show that a lot of thought is being put into the direction the park will be going with its resources. The alternatives seem to represent a pretty good group of mindsets as to what people may be interested in.
- 2. Alternative B. It seems comprehensive in its scope. It will aid in the education of most visitors. Time on the island is short and peoples interests are varied. To have the history readily available in one form r another cannot only keep the trip interesting and give folks something take with them but could spark further historical interest.
- 3. [No answer]
- 4. I would like to see more information made available about the mines. They are waypoints on the trails. A fair amount of effort is spent getting to them and all they are is holes in the ground with maybe some junk laying around. There's got to be more to
- 5. We come to the park to backpack. Last summer was out 4th visit. It seems that there is a lot of time spent on the baot and waiting to leave that the visitors are open to education of this sort. We will be back. Thank you.

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- 1. We love the natural wild beauty of Isle Royale and would hate to see it turned into a Disney park of interpretive displays and commercial activities. On the other hand, it seems a shame to allow the buildings and historic sites to deteriorate when a minimal amount of work would preserve them. Please keep the park services as they are.
- 2. We would prefer a blend of ideas- keep it wild but also keep the structures and historic sites.
- 3. There is a growing number of older people who would volunteer to work at the park. Use this force to maintain sites. We volunteered to work at the park but never got any response.
- 4. Please preserve Belle Isle as it is. It's beautiful.
- 5. [No Answer]

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Private:

Y

Received: Correspondence Type: Correspondence:

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Letter

- 1. I do not like how the NPS has in the past "removed" structures deemed "non-historic" or non-essential, such as on South Manitou Island, or because they are deemed "unsafe" to the public. Leave ruined structures alone, or at least stabilize them.
- 2. Alternative B. Preserving all facets of IR will make it appeal to a broader ranges of potential park-users/fee-payers, not only not but in the distant future.
- 3. [No answer]
- 4. All ruined structures should be stabilized, though I do not support "over-interpretation," i.e., signs, handrails, etc.

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5. [No answer]

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**Correspondence Type:** 

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Correspondence: 1. [No answer]

- 2. Alternative A. Isle Royale should be maintained as a wilderness area not a museum. Minimal saving of human history is our preference.
- 3. [No answer]
- 4. [No answer
- 5. We believe Isle Royale is the only true wilderness in the midwest. There are hundreds of museums. Maintain Isle Royale as a wilderness and present the human history in one area of Isle Royale such as Rock Harbor.

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1. [No answer]

- 2. I prefer alternative B
- 3. [No answer]
- 4. [No answer]
- 5. Maintain ALL existing trails.

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1. There is a concise varied set.

- 2. Alternative A. IT is a responsibel approach that will be sustainable should funding dry up in the future.
- 3. [No answer]
- 4. [No answer]
- 5. History of IR is important, but it is a heavy burden to preserve structures physically. Media will suffice. Remember the draw to IR today is wilderness and solitude.

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1. Alt A: I like that funding would be through traditional means.

Alt B: I like that "In designated wilderness... Isle Royale's wilderness character would be preserved."

Alt C: I DON'T like "lighthouse overnight accommodations" and "guided scuba dive tours." I prefer to keep the commercial aspect out of the park.

Alt D: I DON'T like the significant increase in archaeological inventory.

- 2. I prefer Alternative A the best because it is the most "hands off" of all the plans. I believe at this point in the history of the Park is that most visitors go there for the nature and solitude. Since very little has been done to preserve the cultural resources up until now; I prefer to see it kept that way.
- 3. [No answer]
- 4. [No answer]
- 5. My preferences for IRNP in terms of any changes, are that we seek to cause as little disruption as possible to the environment. I would like to see no added buildings, walkways, docks, or any other type of construction.

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- 1. To be fair, it seems to me that there should be timelines and target dates to achieve each alternative as well as cost/budget \$ associated with each alternative.
- 2. Alt D > I like that it partners with universities.
- 3. I think there should be a hierarchy of cultural epochs to help prioritize projects. Ex: Ice Age pre-Columbian, Native Culture through 1900, Early settlers 1600-1900, post-1900 Industrial etc. People could rate each epoch for importance- they are not all the same.
- 4. Pre-historic and historic copper mines

5. [No answer]

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1. All alternatives provide a good description of the plan.

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- 2. Alternative B- seems to be the broadest- others are narrow
- 3. Alternative B with expanded scope covered in C-sailing, boat building, canoe rentals, and discovery sites.
- 4. [No answer]
- 5. [No answer]

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1. I like how actions common to all alts. were identified. Each of the action areas are important considerations in IRONP management strategies and none should be excluded from management actions.

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2. I support alternative B, because it seems like the lowest cost to implement over a long period of time. Because of the strategy to develop partnerships, the IRONP budget can be focused on fixed costs. I'm also interested in seeing Alt B implemented because it seems to have the greatest potential for increasing the inventory of ethnographic resources when partners with real and inherent interest emerge.

Private:

Y

All my visits have

- 3. [No answer]
- 4. [No answer]
- 5. [No answer]

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been as a backpacker but I have been a student of the history of Isle Royale as well. The concepts described provide for a thoughtful debate about the attention paid to all of the artifacts remaining on the island.

- 2. My preference is Alternative B. All of the history of human presence on Isle Royale is important. This alternative offers perhaps the best balance and potentially takes advantage of strategic partnerships which should help to identify priorities and
- 3. Simply put, all of the concepts must be framed first in the concept of wilderness preservation.

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4. These sites that reflect the presence of humans, whether mining, fishing, shipping or otherwise deserve consideration.

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5. [No answer]

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**Correspondence:** 

1. Thoughtfully done.

- 2. Non action alternative.
- 3. [No answer]
- 4. [No answer]
- 5. [No answer]

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Letter 1. [No answer]

> 2. I prefer alternate B because it "preserves the highest number of historic properties, management would expand education of the multicultural human experience, and opportunities for solitude and primitive recreation would be preserved."

Y

3. [No answer]

4. [No answer]

5. Enhance, protect, and maintain the history and backcountry experience of the island. Thank you!

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Letter 1. [No answer]

2. Alternative A. I enjoy Isle Royale for the wilderness.

3. [No answer]

4. [No answer]

5. [No answer]

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Letter

1. I would like to see more focus on maintaining and preserving the existing park and structures rather than more research and groups who don't necessarily appreciate the nature as much as the archeology.

- 2. Alternative A because it allows for the natural elements of nature to take over. Although several historic sites including fisheries and cabins I found fascinating.
- 3. I think that given the right set of rules and circumstances, private use of the cabins in Tobin Harbor and surrounding areas would be ideal. Owners maintain and keep to code with the era the cabins are from. Park doesn't get the bill.
- 4. The fisheries, very interesting. On my last visit, sea kayaking and seeing the cabins at Tobin Harbor was amazing. The effort and stories behind them left me awe struck. Maybe renting them is an alternative.
- 5. Please devote the resources to maintaining the sites better. Outhouses were full and sites were littered. I know this comes from use but its the only negative at Isle Royale.

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1. Intent of each alternative explained well- cultural resources and more definition

2. Alternative B. Provides the most diverse opportunities to enjoy the park.

3. [No answer]

4. Lighthouses. Historic structures and homes. Mine seats.

5. [No answer]

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Letter

1. I like the choices presented. I don't think we should represent one particular theme over another, for example maritime over

2. Alternative A looks to be a good balance of historical significance and tax dollars.

3. I think NPS should continue to partner with private entities where possible.

4. Specific things that exist in this park that don't exist in any other park.

5. [No answer]

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Letter 1. [No answer]

After some discussion we feel that Alternative B presents the most honest depiction of Isle Royale's history. As described in the Alternative language this alternative reflects "...the entire scope of human history at Isle Royale." Clearly that is as it should be!

- 3. [No answer]
- 4. [No answer]
- 5. [No answer]

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1. Positive, well thought out and planned. Negative, too many choices.

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- 2. Alternate B- this seems to best preserve the historic and wilderness values of Isle Royale. One of the main draws to the area for me is the opportunity for solitude and primitive recreation, ie sea kayaking and camping.
- 3. Efforts to preserve the unique wildlife Isle Royale has to offer including flowers, fauna, wolves, moose, etc.

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- 4. Fire tower Mt. Ojibway, Rock Harbor lighthouse, Rock Harbor lodge, Windigo Campground, Historic Edisen Fishery
- 5. I also like concept of preservation and active interpretation of maritime resources of Isle Royale

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canoeing, powerboating and lately bringing a boat out on the ranger. I like the island just fine as it is and don't have any problem complying with the rules.

- 2. Alt B is best and would seem to maintain the park in its natural state as it presently is.
- 3. Alternative C would seem to be justifiable only if park usage was significantly increased and therefore doesn't seem feasible.
- 4. [No answer]
- 5. Don't discontinue Ranger III

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1. I appreciate that a variety of perspectives were considered because Isle Royale means something different to each individual

- 2. I am inclined toward Alternative A because what I love about the park is the wilderness camping and fishing and hiking. The less modern human intrusion, the better from my perspective. I'm okay with maintaining docks and Adirondack shelters.
- 3. [No answer]
- 4. The non wilderness areas could be managed to provide workshops, courses, and a variety of educational opportunities in collaboration with universities which might appeal to visitors with less inclination to venture into the wilderness.
- 5. [No answer]

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- 1. I like the apparent priority given to maintaining the wilderness qualities at the island. In light of comments from people like Sen. Coburn that Isle Royale is a "waste of money" I'm leery of anything that would add to budget constraints for maintaining the backcountry experience. Also, I would not support even minimal development in the wilderness to facilitate "field schools" or "cultural camps."
- 2. [I'm happy with the way things are now, so the so called no-action alternative would be fine. If not, alternative A. I don't think there's enough value in actually maintaining a deteriorating structure just as a venue for interpretive exercise.
- 3. [No answer]
- 4. [No answer]
- 5. Again, the wilderness experience is most important. Any curiosity aroused by encountering the mine pits along Rock Harbor or the rusting cables on Little Todd Harbor beach could easily be satisfied by information at the ranger station. Thank you for seeking input.

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Private:

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Correspondence: 1. [No answer]

2. [No answer]

3. [No answer]

4. [No answer]

5. [No answer]

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Letter

1. Excellent- well though out, many option

2. Alternative B- covers the mission of the NPS

3. [No answer]

4. Try to balance all areas, starting with the neediest

5. Way of funding as monies have been cut in the past and do not look to change :(

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1. Alternative A would provide most wilderness.

Alternative D would take native peoples' point of view into account, while still maintaining wilderness.

I do not like alternative C at all. Isle ROyale as a wilderness is a place for the hardy to get away from people and crowds. Alternative C would make it much more "touristy" and busy. There are other places for this kind of programming.

2. Alternative D seems like the best choice to satisfy native peoples' concerns, preserve as much wilderness as possible and not significantly increase human traffic on to the island.

Y

3. I didn't receive the wilderness planning report. The wilderness aspect of Isle Royale is what matters most to me. There are so few places left of wilderness. I do not want to see more touristy activities and more people there. There are other places close enough by to teach/show history of human involvement.

4. For the wilderness experience, the harder it is to get there, and the fewer services provided, the less people will come. To my way of thinking, that is good. Then the hardy folks who do get there will get a more authentic wilderness experience (as best we can do in 2013).

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5. Please do not modernize. Especially with cellphone access, flush toilets, etc. etc.

Also, if there are volunteer opportunities on or for the island, I would be interested.

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Correspondence: 1. [No answer]

2. [No answer]

3. [No answer]

4. [No answer]

5. [No answer]

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1. Those plans (alternatives C and D) are taking things too far. You can't or shouldn't try to turn a wild park into a museum. Talk to visitors about what was but don't attempt to restore or develop programs around the remains of previous civilizations.

2. Alternative B that involves basic management and interpretation of the sites.

3. The real feature of this park is its wilderness and aloofness. It should be somewhat challenging to get there and to be there. People need to succeed and appreciate their success in bid and small doses! Don't take the challenge of wilderness away.

4. I look forward to seeing the wilderness planning document.

5. [No answer]

Correspondence ID:

33691 55915 35 Project: Document:

Received: **Correspondence Type:** 

Nov,15,2013 00:00:00 Letter

Correspondence:

- 1. I think they are all good plans, the one thing I don't like is that they seem to be specific to only one aspect of the diverse history/nature of the park. If there was one plan that had a larger scope, I believe that would benefit the park the best. I know
- 2. "B". This seems to cover the most amount of history and natural resources. I find ti difficult to choose between the maritime, archeological, or mining.
- 3. As I stated in the first response, a broad program is necessary. I don't believe any single aspect of the Park is more important than another.
- 4. Rock of Ages lighthouse.
- 5. [No answer]

1. [No answer]

Correspondence ID:

**Document:** Project: 33691

Received: **Correspondence Type:** Correspondence:

Nov,15,2013 00:00:00 Letter

2. Alternative B. We believe in a holistic approach and would like to see a broad based plan. Once a building or entity is allowed to deteriorate, it can never be replaced, and there are many facets to Isle Royale history and experience to savor and enjoy. Many more people could be served with a broad range of activities rather than just focusing on one area.

55915

- 3. The Moose/Wolf study was not discussed so, hopefully, it would continue.
- 4. [No answer]
- 5. [No answer]

Nov,15,2013 00:00:00

Correspondence ID:

Project: 33691 **Document:** 55915 Private: Y

Received: **Correspondence Type:** 

Letter

Correspondence:

1. No action or alternative "C". Alternative "D" would be terrible.

- 2. Alternative "C". The park is in a marine environment, all visitors come by boat.
- 3. [No answer]
- 4. [No answer]
- 5. [No answer]

**Correspondence ID:** 

Project: 33691 **Document:** 55915 Private: Y

Received:

Nov,17,2013 00:00:00 **Correspondence Type:** Web Form

**Correspondence:** Topic Question 2:

The "bottom line" for me is the quality of the IRNP wilderness experience. Only the mines, to me, have ANY cultural value. All the human structures could be removed or allowed to deteriorate. Alternative A, for sure.

The other alternatives have increased "management" and I am skeptical that that will improve the park.

I am also skeptical about the "partnerships" described in Alternative B. What's next "McCargo Cove, sponsored by Pepsi?"

Topic Question 5:

More than most, I appreciate culture in all its forms. I'm the dorky guy who reads the historical markers along the highways. I have perused AT Bolen's book "Becoming Wilderness." So I get the culture part.

And I do understand financial and political realities. But...

IR is unique, even in the world. For many of us, a trip there a spiritual journey as much as anything else. I have been there twice, about 40 years apart, and my last trip was my opportunity to evaluate my life, free of all the "clutter" of modern living. I was able to compare the more slothful 60 yr old version with its 21 yr old long haired counterpart.

I returned renewed, cleansed, and with new purpose and vigor. So I favor no or only minimal "development" of the most important cultural things. Mines, yes, but all the wooden building can be removed. Please remember that we are not talking about structures built in the middle ages.

Those who want more culture have other options- Mackinac Island has great history.

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Thanks for listening. I appreciate your work

**Correspondence ID:** 

Project: 33691

Received: **Correspondence Type:**  Nov,18,2013 12:36:55

Correspondence:

Web Form Topic Question 1:

I like that a "No-Action Alternative" was identified and presented along with other draft alternative concepts.

I like that increased effort to inventory Ethnographic Resources is an action common to all Preliminary Alternative Concepts.

I like that Private Residential Leases and Special Use Permits will be allowed to expire and will not be renewed or extended.

I prefer Alternative A because it contains two aspects of Cultural Resource Managment, that I believe, are most appropriate for IRNP's long term CRMP strategy. They are 1) identification and stabilization of significant cultural resources, in good condition, outside of designated wilderness areas and 2) reliance on visitor interpretation as the primary means for visitor understanding of cultural resources.

# Topic Question 4:

I would prefer to included canoe rental with all draft alternative concepts as, I believe, visitors benefit from the opportunity to explore IRNP's littoral and maritime environments.

# Comments:

Correspondence ID: Received:

Project:

Nov,15,2013 00:00:00

33691

**Correspondence Type:** 

Correspondence:

Letter 1. The concepts cover a full range of "alternatives" for this park and outline the plan for implementation. The alternatives created a debate within myself; the wilderness concept or the alternative of a developed interpretive program. 2nd: That the implementation wouldn't be until 2016.

Private:

Y

55915

- 2. "Alternative A": I have backpacked Isle Royale 3 times and do so because of the wilderness being it's significant resources. I like Sleeping Bear Dunes National Lakeshore concept of preserving the historic farm lands and buildings but that is a totally different park (like Gettysburg preserving the civil war battlefields).
- 3. I think the park service on Isle Royale should develop a verbal interpretive on historical, maritime, and archeological background. This program should be given at the east and west ends of the island (and even Dairy Farm) and leave the wilderness to the "backpackers"
- 4. Just the "Wilderness concept"
- 5. I have always felt very proud of our national park service; whatever the park service does, turns out good. Thank you!!!!

Correspondence ID: Received:

33691 Project: Nov,15,2013 00:00:00

Correspondence Type:

Letter

Correspondence: 1. It is important to preserve the park as it is unique in nature and has a lot of cultural resources associated with it.

2. B. As it is more broad and encompasses more aspects of the cultural resources. You can use it for a long period of time and it

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- doesn't lock into specific resources.
- 3. As a fisherman I feel the fisheries need to be preserved. The docks are most important because without them no cultural resources could be enjoyed. The people are also cultural resources.
- 4. I am not so naive to think the fisheries are the only cultural resources. That's why plan B is the best start.
- 5. Thanks for letting us share in your decision making. Hopefully it will lead to the best management plan possible as the overall management plan isn't so hot.

**Correspondence ID:** Received:

Project: Nov,15,2013 00:00:00

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55915 **Document:** 

Correspondence Type: Letter

Correspondence:

1. [No answer]

- 2. Been receiving 2 copies, both with wrong addresses. Only would like to receive 1 copy. Correct address is in front or below. Thank you.
- 3. Like everything first the way it is.
- 4. [No answer]
- 5. [No answer]

**Correspondence ID:** 

Correspondence:

Received:

Project: Nov,15,2013 00:00:00

33691 **Document:**  55915

**Private:** 

**Correspondence Type:** 

Letter

1. I appreciate the park service being more open to input. I hope NPS and families can work together to preserve both wilderness and culture the island experience has to offer.

2. Plant B interest me.

When I bring people fishing in the park, the biggest interests lie in the culture (old

settlements).

- 3. When I visited crystal cove and for the first time this year I witnessed the short time/fast degradation of the structures there. It was truly heart breaking!
- 4. Many older structures ought to be lived in and maintained by the descendants of the historic families of Isle Royale. Partnering with park service to achieve certain "expectations", maintenance, public visitation hours, long term perspectives.

5. The visitors to IR. I've observed most interest lies in the history of buildings/culture.

**Correspondence ID:** 

Received:

Project:

33691 **Document:**  55915

Private:

Y

**Correspondence Type:** Correspondence:

Nov,15,2013 00:00:00

Letter

- 1. I like the no-action alternative. I do not like the alternative B, C, or D. My concern is having "outside" partnerships taking over the park. Money/funding is always the #1 factor in what gets done. Outside groups have the money but do they have the same goals as the Park Service?
- 2. I understand the need to find funding but finding a balance between keeping the island a wilderness plan and preservation is difficult. There are too many outside groups wanting a part of the island. Limit outside groups is the plan I support.
- 3. I don't think you missed or overlooked anything. Well thought out options. Thank you for asking my opinion.
- 4. None that I can think of. you covered most of it.
- 5. As I stated above I don't want outside groups taking over the island because they have the funding. To me Isle Royale is a place of wilderness not a place to have tours of sunken ships, copper mines, etc. I understand the need to have preservation of historical items but have that in a museum back on the mainland.

back then it was a wilderness place. Please keep it that way!

**Correspondence ID:** Received:

45 Nov,19,2013 00:00:00

**Document:** 

Correspondence Type: Correspondence:

Project: 33691 55915

Letter 1. The whole concept of a cultural resources management plan sounds like a huge waste of money. Please disband and redirect funding to maintenance of trails and facilities.

- 2. [No answer]
- 3. [No answer]
- 4. [No answer]
- 5. [No answer]

Correspondence ID: Received:

33691 **Document:** 55915 Project:

Nov,15,2013 00:00:00

**Correspondence Type:** 

Correspondence:

Letter

- 1. I like all the concepts but of course we have to choose what is best to enhance the original concept, or mandate or mission of the congress in 1931 which I believe was to "create a pristine wilderness for all people to enjoy for all time... without the hand of man on it.
- 2. If each generation gets to define what Isle Royale is... to change the original concept to one of their choosing... the original

mandate of Congress will be lost. No more wilderness for all men for all time.

- 3. [No answer]
- 4. [No answer]
- 5. The cultural aspect is important. "Man is part of wilderness and the two can't be separated." But one has to dominate. I think "Wilderness" must dominate with "culture" in the background. The cultural story can be told in books. If we made a school out of Isle Royale we will have lost the wilderness aspect. The reason so many people sacrificed their land, livelihoods, and life style was to create a wilderness without the hand of man on it. So far an unkept promise to the people from their government. Do we or future generations have the power to change that mandate to please ourselves? Can we get by with a "wilderness theme park"?

Correspondence ID: Received: Correspondence Type: Correspondence: 47 **Project:** 33691 **Document:** 55915

Nov,15,2013 00:00:00

Letter

- 1. I do like the idea of preserving the island past and historic properties, such as cabins, lighthouses, and other historic places. The past should be preserved so people can see how things were. I don't like the idea of letting buildings rot and tearing them down along with a part of the Island's history.
- 2. Plan B.
- 3. [No answer]
- 4. The lighthouses, The cabin at Tobin Harbor and elsewhere, Wright Island, Barnum, and Crystal Cove, fishermen home cove, etc. The mine sites and all the islands past history so people can see and feel the past.

[Attachment]

every year I try to explore different parts of the island and the island's past. I have paddled around the island and all the portages and inland lakes. I have been to all most all the historic places on the island. When I first came to the island I fell in love with the island and the past history of it and the people who lived there, so I have gone to the historic sites to see them and see how people lived and survived on the Island, but over the years I have seen building and other historic items deteriorate and fall down, which I felt sadden by to see the past sliding away so other people could not see or feel the same things I have saw or felt. So I was very happy to see the park service restoring and maintaining a few of the historic places, crysat cove, Barnum Island, but there are other places that need to be preserved also such as the lighthouses on Passage Island, Menagerie and Rock of Ages, the cabin on Wright Island, cabins in Tobin Harbor.

To see the history of the island slip away a shame, that is why I am in favor of plan B and parts of plan C and D. I do not think other resources related to other themes in designated wilderness or potential wilderness areas should be allowed to deteriorate. They should be maintained too so when people go to the areas they can see the past is, not was.

When things are documents and removed or allowed to deteriorate, the past is lost and hard to find. Documents and artifacts get stored away and hard to find or see, such as the 1000's of artifacts stored in Kanas [sp?] and other museums. Whatever happened to all the old furniture that was stored in the buildings at Crystal Cove. The park service should have a museum in Houghton or on the island so people can see the past relics and documents of the island. I have had a hard time digging up the past history of the island, a piece here, a many a book a fact here and there, which took me many years to find. It would be nice to have the history in one place.

Many years ago there were signs at McCargoe Cove, Minong Mine, Siskiwit Bay that showed and explained the places and areas in which they were, but over the years some people didn't think they fit in the wilderness, so they were taken down. Now a person who goes to these areas has no clue what was there. I thought the signs fit in very well and do not hamper with the wilderness. The island still has its past that should be kept up so people can see it and not just read about. The island also still has its wilderness, even if a cabin or lighthouse are in the middle of it, it is still wild. When we leave the island the moose, wolf, fox, and etc. don't care if a building is there or not.

I did a solo trip around the island in a fourteen foot boat and motor about the same size as many a small fishing boat back in the day. I stopped at Saginaw Mine and thought about how hard it had to be to walk to work every day through the woods to go to work and I was so happy to see relics still at the mine site and got some great pictures, the on to chipewa harbor to see the old school house fixed up and people left old relics in the house, then on to Malone Bay and over to Wright Island to see the cabin and boats and the old flower gardens that still grow there, how beautiful. Then on to Siskiwit Bay, Senter Point and up Island Mine Trail, what great history, mining, historic wells, CC camps, a quickstop at fishermens home cove, cool little place, and oyaw menagerie Island, a spine of rock with a lighthouse on top, how they ever lived there for a whole summer with a family, wow! I would love to stay there in the lighthouse during a storm, then on to Grace Island and Washington Harbor, more history and mines, what a great welcome center, should have more artifacts. Then on over the shipwreck America and around to the northshore with a quick stop at Huginnin Cove the old dock that is still there and on to Todd Harbor with more mining history and beautiful sunsets, then past the Kamloops shipwreck and on to McCargoe Cove and Minong Mine. More mining history, then on past Amygdaloid Ranger Station and the cool little cabin, with a stop at the sea arch and a stay at Belle Isle with its lilacs, roses, and other flower form a past time. A stop at Crystal Cove for some fishing and resort past. Then on to the Palisades and past the Monarch shipwreck, can you believe the lighthouses keeper rowed there and back and then on to thunder bay. Around Blake Point and down Merrit Lane, beautiful, then into Tobin Harbor and all the nice little cabins on the island and shore. Then back to Rock Harbor and home with many memories, pictures and a lot of history on my mind, so that why I am in favor of plan B. So as in good faith of the National Park Service, please keep up the good work in keeping our past history alive and well for the future.

Correspondence ID: 33691 **Document:** 55915 Project: Received: Nov,15,2013 00:00:00 **Correspondence Type:** Letter Correspondence: 1. I like the fact that all of the alternatives preserve the wilderness nature of the park, and will make minimal impact to designated wilderness areas. 2. I like alternative B because it doesn't emphasize one cultural aspect over another. The park has a rich land and water history over many time periods with a variety of peoples and cultures represented. 3. None 4. I like being able to explore some of the mines, and I hope they do not become "off limits" to hikers. 5. Please protect the wilderness and "wild-ness" of the island! Correspondence ID: Private: Y Project: 33691 **Document:** Nov,15,2013 00:00:00 Received: Correspondence Type: Letter Correspondence: 1. [No answer] 2. Plan B- try to save it all! 3. There should be a really great interactive destination museum 4. [No answer] 5. A glass bottom boat 33691 55915 Correspondence ID: Document: Project: Nov,20,2013 00:00:00 Received: **Correspondence Type:** Correspondence: 1. Very concise and to the point. All alternatives are explained without too much bureaucratic wording. Maybe add a small chart showing all alternative summaries side by side for comparison. 2. Alt "A"- maintain a minimal representation of all human cultural eras on the island, one mining pit could give the public the feel for that age. Document and record the rest and let the island heal them over. 3. [No answer] 4. [No answer] 5. Only unique sites should be preserved in the wilderness designated areas. **Correspondence ID:** Project: 33691 **Document:** 55915 Received: Nov,20,2013 00:00:00 **Correspondence Type:** Letter **Correspondence:** 1. I am grateful to be notified about this planning process. 2. Alternative A- I have spent time kayaking and camping at Isle Royale. The park is a great source of recreation for me. I have realized that without understanding the human uses of the area, there cannot be a complete understanding of historical lifestyles humans had in N. Michigan. 3. [No answer] 4. Representatives of structures that were important to human use of the area should be preserved. However, I feel the park should be seen and preserved as a wilderness area.

Correspondence ID: Received: Correspondence Type:

Correspondence:

52 **Project:** 33691 **Document:** 55915 Nov,20,2013 00:00:00

Nov,20,2013 00 Letter

which are public and wild.

1. Alternative C scares me. Two other things which scare me even more are the concurrent work on a Foundation Document and a review of the Wilderness and Backcountry Management Plan. There's a danger here, a real potential, for extreme and lasting change that would totally alter the character of Isle Royale.

5. Please consider users input. Please continue to preserve Isle Royale and its ecosystem. We have a distinct shortage of areas

- 2. If we don't get carried away with Alternative B, it is by far the best choice, but while time is of the essence, its implementation would have to be approached carefully. Otherwise, the changes in Island character that are bound to occur could get out of hand.
- 3. [No answer]
- 4. [No answer]

witnessed both the constants and the changes in the Island from that perspective

**Document:** 

I have, therefore,

Correspondence ID: Received:

Project:

33691 Nov,20,2013 00:00:00

**Correspondence Type:** 

Letter

Correspondence:

- 1. I support alternative B
- 2. Alternative B- It preserves both historical properties and cultural resources
- 3. The plan described sounds great!
- 4. Historic fisheries, mine sites, shipwrecks, and historic buildings should be preserved because they are all important resources to Isle Royale National Park.

55915

5. Isle Royale is an important national resource that I look forward to visiting many times in the future. I enjoy backpacking and fishing in the park. It is an awesome park that I always recommend to others.

55915

Correspondence ID: Received:

Project:

Nov,20,2013 09:19:12

**Correspondence Type:** Correspondence:

Web Form Topic Question 1:

To much time, effort and monies are spent on ethnographic studies already.

**Document:** 

Topic Question 2:

2. The NO-Action Alternative

Money savings.

Topic Question 3:

1. Îsle Royale use over the years has been four-fold.

33691

- a. Maritime safety
- b. Mining
- b. Fishing
- c. Tourism and Recreation

Any preservation efforts beyond that is wasted money.

Topic Question 4:

The lighthouses and all of the docks that were in place 68 years ago.

Wright Island..... and multiple others that are being allowed to decay. Open up camping, access and docking to all of these sites.

# Topic Ouestion 5:

Any monies allotted to or generated by the park should be for the sole use of preservation of docks (fishing, recreation and tourist access), preservation of existing cabins/shelters (for recreational/tourist/fishing use), and maintaining the park as it is. If an old building falls over, let it fall and put up a picture on the site. Stop locking up all of the buildings in remote places. Let them be self interpreted.

Special use allowances should be strictly voluntary, with NO assistance provided. It is for their own benefit, and the IRNP visitor should be allowed free access to the areas that the user is occupying.

Life leases of cabins or commercial fisheries should be allowed with public access maintained by the NPS.

Get rid of the so called...Artist-in-Residence programs of the past. The taxpayer/IR user assisted boondoggles for individuals that are in place are a waste and provide no value to the visitor. If a volunteer chose to do this work, let them do it on their own with no assistance. If a visitor wanted to see art, go to an art gallery, or create their own on site, not at taxpayer or user expense.

# MAIN ITEM:

Let the park be self interpretation as it was 68 years ago.

If a person wanted a guided tour, hire someone to show them around or take a tour boat with any variety of stops as desired.

A simple, permanent, picture history at each location would suffice to give the visitor at each location a general history of each location. I believe this would save money and be more interesting to each visitor than seeing a fallen down shack. A person needs to be able to access these areas. If we can't get there and dock, or camp safely, it's of NO use to have shacks/cabins maintained in outlying areas.

Comments: I am sure, when the Park was first incorporated, there were people and establishments all over the island. Access to these areas needs to be maintained. Almost all areas of the Island are accessible, but they need safe access and camping opportunities maintained.

One other thing, if the wolves die out, don't introduce any more! This is the natural progression of an Island. Is that not obvious. If a plant dies out for whatever reason, is that reintroduced also? I think not.

I realize this is a comment on Cultural Resource Management, but the monies expended on the wolf studies would be better off spent on access and dock preservation, ie....part of access to Cultural Resources.

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**Correspondence ID:** 

**Project:** 33691 55 Document:

Received: Correspondence Type: Correspondence:

Nov,20,2013 15:31:13 Web Form

Topic Question 1:

While 4 plans have been drafted, it seems that they all revolve around 'do or don't do' or 'preserve or don't preserve'. Why not then just form a laundry list of all the resources of the island and provide the choice of 'preserve or let deteriorate' as related to the existing locations of interest, and for future proposed topics, like 'educational camps' have an option for 'fund or don't fund'. Because that's really what we're talking about, is where to spend the money that is appropriated to you.

# Topic Question 2:

I prefer to let nature reclaim the island. It is an exceedingly remote destination that is arrived at only via a determined effort of an individual. Its my opinion that the vast majority of these individuals are not interested in seeing a nicely restored cabin in the woods previously owned by somebody they've never heard of. There are dozens of places exactly like this on the shores of all the states and provinces surrounding Lake Superior. It's my opinion that the island draws lovers of the outdoors and nature who are looking for a wild experience. With any structures on the island, simply open the doors and put a little sign in front saying 'enter at your own risk, no sleeping inside'. As for the underwater resources, they should be managed to the point where no divers are allowed to take anything from the wrecks, but leave the sites open and let divers enter at their own risk. It would be a waste of time and money to have dive boats register with park rangers.

# Topic Question 3:

Keep the trail system the way it is, as in only 'improved' by the feet passing over it, and trail markers at junctions. Hikers can put up cairns in any location the trail becomes indiscernible.

# Topic Ouestion 5:

The park is a 5 hour boat ride from land, its not a place for casual tourists. Please let it be wild. Anybody sleeping there besides park management staff should be in a tent or under the stars. My recommendation is for 'no development' on the island and only a historical survey of what is there now to be recorded for posterity.

Comments:

Correspondence ID:

Project: 33691 56 Document: 55915

Received: Nov,20,2013 16:32:24 Correspondence Type: Correspondence:

Web Form Topic Question 1:

It appears alot of thought has gone into these concepts. I think that there are parts of each one that I can support. I do not like that the cottages and camps that are now in danger of being eliminated or removed. should be maintained and preserved.

# Topic Question 2:

I think all of the cultural history is important and valuable to future generations. Even people who love a wilderness experience value and are interested in how why and what went on on Isle Royale before they arrived.

I am sure it all comes down to money but I strongly feel there is less enthusiasm to maintain the recent cultural history ...by recent i mean from 1870-present. The fishermen and women and the summer residents are very important in my view.

# Topic Question 4:

I think the Tobin Harbor community is unique and pictoresque and rich with history..here is an opportunity to build an historical experience in this wonderful harbor.

# Topic Question 5:

There are good parts to all the scenarios and perhaps a combination of the essence of all would be best. I do not see much enthusiasm for maintaining the historical stuctures and people who have historic ties to the island in any of these alternatives.

Comments: The NPS should build partnerships with existing groups who can provide historical relevance and should utilize a number of proven mechanisms currently used successfully in other National Parks, to maintain and interpret many of the structures at Isle Royale. This may include historic leases, legal agreements such as Volunteer in the Park permits and Special Use Permits with individuals and original occupants and their descendants, and other partnerships with non-profits and individuals to maintain and raise funding to manage and maintain structures.

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I appreciate that these meetings are held...I don't feel they are well publicized nor are they well attended. It does feel like the meetings are begrudgingly held and that most minds are made up as to how this is all going to end. If in fact our input is valued and incorporated and

**Correspondence ID:** Received:

Project: 33691 Nov,21,2013 07:51:09

**Correspondence Type:** Web Form

Correspondence:

Topic Question 1:

1) I approve of the actions common to all preliminary alternative concepts. Isle Royale's wilderness designation is a key mandate for the park, and it's emphasis in planning is more than appropriate. It's also good to hear that there will be an increased effort to inventory ethnographic resources. Not all of the resources can, or should be, maintained. However, documenting cultural and historical resources will preserve the knowledge and information for future generations. I also believe it's important for the life leases to expire, as planned and agreed upon. It's important for the park to move forward as a \*public park\*, not with private inholdings.

# Topic Question 2:

2) There are parts of all four alternatives that I find attractive. Choosing one alternative, I feel B is the most appropriate.

3) As mentioned above, there are pieces of all of the alternatives that could be valuable to the park.

**Document:** 

From Alternative A, I believe that allowing structures within wilderness areas to deteriorate is appropriate. There is something to be said about the beauty of nature reclaiming itself after humans have left. There have been so many moments when I have come upon a falling structure, or rock wall, and let my imagination run with scenarios of the past. It's amazing to think of how people survived in the wilderness of Isle Royale, and it's even more amazing to see how the Island is healing itself in the wake of these peoples.

From Alternative B, I do believe that there are many opportunities for this park to increase visitor education on the human activities of the near and distant past. In an era of ever increasing environmental issues, educating the public on how we as humans interact with nature is critical.

From Alternative C, the idea of lightkeeper programs is very attractive. The lighthouses are beautiful and historic structures that should be maintained. By creating a program that allows people to stay at the lighthouses, the park could receive hands-on assistance in maintenance, a location for educational programs, and perhaps some fee income to help with upkeep costs. However, the idea of craft schools and educational camps seems to conflict with the overall wilderness goal of the park. Could these ideas be implemented without additional infrastructure development and increased pressure on the island's environment?

From Alternative D, I like the idea of an emphasis on the park's archaeological resources and improved tribal involvement. Combining this option with several aspects of the other alternatives would give the park a very balanced look at cultural resources from all eras.

Comments:

**Correspondence ID:** Received:

Project: 33691 58 Document: 55915

Nov,22,2013 10:18:03 Correspondence Type: Web Form

Correspondence: Topic Question 1:

The Park has a General Management Plan, isn't drafting a Foundation Plan redundant?

Alternative B is the most comprehensive approach to the Park's proposed plan.

If Cultural Resources are to be retained this approach makes the most sense.

There has been a lot of discussion whether structures should exist in the Park (outside of the structures the NPS uses). History has always been an important part of the NPS. To remove the structures, boats ect from the Park is to deny the existence of a different way of life, a different era. I am a hands on person, I want to see the actual boat that was built by hand and used to fish the waters of Isle Royale. I want to see the actual house the fisherman and his family lived in. Too many historical narratives rely on words and pictures to convey a lifestyle.

# Topic Question 3:

Other divisions of the NPS and USFS offer the opportunity to stay in historic structures such as fire towers and ranger cabins. Why not offer the same with the structures in Tobin and Washington Harbors. The NPS could contract the concessionaire who runs the lodge to do the same with the cabins and houses. It is the opportunity to experience a life long gone. It would be a good source of revenue for maintaining the structures.

I have read of the various families that lived on Isle Royale. Sitting at Malone Bay looking at Menagerie Island or walking around Wright Island, being able to see the structures makes the history "real" and not something read in a book.

# Topic Question 4:

The cabins and fisheries in Tobin and Washington Harbor and the outer islands and boats used by the same should be preserved.

Passage Island and Menagerie Island Lighthouses and Houses should be preserved and keepers should be stationed there in summer.

Comments: I think Madison should be a site where the public meetings are held. The folks from Duluth can go to the Twin Cities for meetings. There is not a close destination for the folks in Southern WI and Northern IL to attend.

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Correspondence ID: Received:

59 Project:

Nov,25,2013 00:00:00

**Correspondence Type:** 

E-mail

1. I like how the cultural options are divided among "all history" "nautical" and "pre-contact." Correspondence:

Document:

**Document:** 

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- 2. I prefer "A"; to me, the island is most significant as a wilderness; I worry that the activities associated with B, C, and D would detract from the wilderness or involve more human intervention.
- 3. None that I can think of.
- 4. Wendigo Mines. Island Mine. Minong Mine. Siskiwit Mine. Keep these, let nature take over. No need to "preserve" beyond safety concerns. Underwater wrecks- these are interesting, and separate/unaffected by wilderness.
- 5. Wilderness is key. There are so few places in this world where people can experience wilderness. I'd be more interested in seeing how people now react/respond to wilderness (as opposed to how they used to interact). Your artists-in-residence program is a good example.

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Correspondence ID:

60 Project: 33691

Received:

Nov,25,2013 00:00:00

Correspondence Type: Correspondence:

Letter

- 1. No answer
  - 2. Alternative B seems best for the Island, "Does not emphasize one historic theme or time period over another and preserves the highest number of historic properties". This appeals to me the most because the Island has visitors of a wide variety of interests. Selecting a specific theme or time period as other alternatives support would prove counter productive to the Service. Preserving the "highest number of historic properties" also appeals to me as a history buff and frequent visitor to the Island.
  - 3. No answer
  - 4. No answer
  - 5. I love hiking the trails and canoeing the lakes and the perimeter of the Island. I hope the Island will always be rugged "pristine" and allowed to live as naturally as possible without human meddling.

55915

Correspondence ID:

Received:

Project:

Nov,12,2013 00:00:00

Transcript

**Correspondence Type:** Correspondence:

Document stories from 1550s to today

Boats thru time

Diesel generator at Mott

How to record the decades from park

Artifact the lorelei- pat of history bus boats [unreadable]

33691

Story of water and [unreadable] processes in pristine one. [Unreadable] Boater focus on near-shore- [unreadable] Caribou. tell the stories. Passage Island.

**Document:** 

Travel stories

Continuing the maritime culture

Balllast H2O History

Logger on Isle on Long Pt needs to be preserved.

Story of human use shouldn't

Preserve Fi. Home and Crystal Cove, Wrights go keep well-preserved building

People history engaged in places you will be keeping from 1940s to not

Don't make it another forest, keep human story in the mix

Likes partnership opportunities like max keep adopt a structure program

Alternative B

Docks should be preserved but can we use them?

Fishery stock last surviving [unreadable] lake trout in Lake Superior. Red Fish attached by Lampret no action to get rid of

More than rocks trees and water, also people, the fishing people are a cultural resource.

Ray: Cultural more important to ISRO than wilderness, not against wilderness, just no history [unreadable] emphasis I look at history.

Need maintain what you have, saves money to maintain what you have

Many stories of recent history people know

Windigo carpenter [?] [unreadable] document of that work

Keep view of future and what will become important.

# Alternative C

Too narrow a focus= why limit yourself

Want to find out more about pre-European development

If we do cultural camps etc., keep it small. Also will need support and supervision and work before hand because out of element. Capture 1955-2013

Like boats= keep a representative sample from various years

Though time how have people dealt with water and work water, energy, garbage, docks and dock building techniques.

Coal burning= probably only boats

Fishing and sport fishing

Continued access is very important for our visitors, esp. boaters and will need a dock to see these places

Document the history of the residents, people and provide for people

Lake trout fishery = specific kind of trout

Lamprey are coming back

Make an effort to clear out the mine areas like Island Mine and then provide a way to understand what was there

History of NPS boats through time

Adopt a ? programs could be fun (different areas for a structure or site, for the retired people could be a club, and they get a sense of ownership

Isle Royale without the cultural stuff is just a stinking rock covered with trees.

# Alternative D

NPS is misconstruing wilderness concept. Put up too high of a pressure in respect to other resources. If it conflicts (the alternative or resource) with wilderness then work to make them complement one another. Don't have one trump the other.

Likes Alt D. Bottom two bullets [on the poster] are favorite.

Loves the presentation aspect of arch. on ISRO in context with other places on mainland that have been adversely impacted.

# Actions Common to All

What is the relationship between it being an international biosphere reserve?

Purpose- is not specific to ISRO

SO28- Will conduct an ethnographic review

Alt B- best because it is the most broad

Shouldn't limit ethnographic inventory to TAP

TAP disintegration

Add other consulting parties to the ethnographic actions common to all

Park service has a bias re: wilderness

Free [unreadable] and free maintenance are provided by the SUPs and VIPs

**Document:** 

Learn about and firsthand from the people out on the islands

History is ongoing to this moment

Need people from different interest groups to participate in partnerships- boaters association, kayakers, hikers Safety issues a concern w/ boaters and kayakers, especially with fewer park staff, boaters are helpful in this.

Correspondence ID: Received:

52 **Project:** 33691

Nov,12,2013 00:00:00

Correspondence Type: Letter

Correspondence: Isle Royale Wolves-

There is only one, fundamental question

Many issues have been raised about the "correct" management strategy for the wolves, the moose and the balance of this wild ecosystem. What is the impact of climate change and other human and natural influences? What is the proper way to manage this ecosystem in light of its legal designation as Wilderness? An important question, not often asked, is what is the past and present role of humans in the development of this natural and cultural landscape? What is the role of Isle Royale in America's National Park System? Is it worthy or an extravagance we cannot afford?

In my opinion, though, there is only one fundamental question to be asked about the interaction of the wolves and moose of Isle Royale. It is a simple, straightforward question; its answer is complex and subject to disagreement. This one question must be the question that guides the investigation and management actions of all who love and treasure this very special place.

What is the best science we can learn from this place?

What I learned was that generally about half those visiting the Island had been there before; my first reaction was appreciation for their dedication. Then I realized that also meant that out of roughly 18,000 people a year who get to the Island, only about 9,000 are first time visitors. Only 9,000 who will be introduced to this wonderful place and hopefully fall under its spell, and become additional champions for this place. Only 9,000 people out of a nation of 300 million.

That means, to me, that for Isle Royale to continue to be a treasured and protected place, it must be known and appreciated by far more people than will ever have the good fortune to visit the Island.

They say you don't sell the steak, you sell the sizzle. When you can point to the Wolf-Moose study and say here, on this isolated, protected place in the middle of Lake Superior, is the longest-running study of a major predator and its prey anyplace in the entire world,- that is "sizzle".

Another crass marketing term is to say the Wolf-Moose Study is a loss-leader. "Sizzle," "loss-leader," whatever; the significance of the Wolf-Moose study speaks to people in simple compelling terms. It is easy to digest and embrace. It has value- to science and to us as a nation.

Because it has this great value to science (and in turn to we the people) we are obligated to keep that one, fundamental question at the forefront- what is the best science we can learn from this place?

The wolves at Isle Royale are special. They are special because they are isolated in a relatively simple ecosystem, with fewer variables to deal with. They are special because they are few, in a region blessed with many. Indeed, the wolves of Isle Royale are special because they are expendable.

They are not the last of their species- but we can ask, what if they were? Where does genetic degradation draw a line that can't be crossed? Is their best value to science to simply watch the extinction process play out? Is their best value to learn about rescuing an "endangered" population of high-order predators? Is speciation a possible outcome to genetic isolation?

Regardless of the specific questions, they must all be asked in the context of one, fundamental question- what is the best science we can learn from this place?

Isle Royale is not a stage or a movie set. It has not been, and should never be, fixed in time. The moose arrived early in the 20th Century; the wolves in the middle of the 20th Century. It is rather presumptuous of us to dictate that wolves and moose should always be on Isle Royale simply because they have been for the few decades we have known and protected this place.

Our obligation, as managers and champions of this special place, is to ask the best questions to help us gain a better understanding of life on this fragile globe. To do that we must always keep the one, fundamental question in our sights- what is the best science we can learn from this place?

November 12, 2013

Correspondence ID: Received:

63 **Project:**  33691

55915 Document:

**Correspondence Type:** 

Nov,12,2013 00:00:00

Letter

IRFFA CRMP Statement Correspondence:

> IRFFA comes to the table to discuss cultural resource management options with an escalating level of frustration with Isle Royale National Park's (IRNP) cultural resource management (CRMP) process to date. Our three concerns include CRMP development procedures, premature and inaccurate traditional associated peoples (TAP) ruling and documentation, and statements made and omissions in IRNP's October 28, 2013 CRMP Newsletter 2.

# Procedures

IRFFA raised concerns at the first set of public CRMP meetings regarding the short notice, meeting format, and order of events for the meetings. Unfortunately, we have the same concerns for the second set of public meetings and some additional concerns.

- -Timing- For several reasons, the second set of public meetings have been scheduled with the shortest adequate meeting notice required by law. IRNP has national, dispersed stakeholder audience. IRFFA repeats our request for more advanced notice for IRNP's CRMP public and consulting party meetings.
- -Listening session format- NPS has elected to run public meetings in a listening session format. The format is unstructured, undocumented, and open for internal NPS interpretation. IRFFA requests more formal public meetings with statements documented and recorded for future reference.
- -Order of events- NPS has elected to run public and consulting party meetings in parallel. IRFFA requests that NPS meet with Consulting Parties first, then hold public meetings.
- -Sufficient ethnographic information- According to Management Policies (2:5): "Sufficient information will be available prior to initiating a plan... The ethnographic overview and assessment will be initiated before ordering plan scoping." IRFFA disagrees with IRNP that it has collected sufficient ethnographic information to develop an accurate cultural resource management plan. IRFFA requests that NPS identify and include areas of insufficient ethnographic documentation as part of the CRMP process.

Earlier this year, Superintendent Green ruled that a narrow group of individuals qualified for TAP status. This ruling potentially excludes several groups and individuals with long-term and significant ethnographic association with the Park.

- -TAP ruling- Superintendent Green, recently ruled in favor of Traditional Associated People designation for a select group of individuals. IRFFA applauds the concept behind this designation. However, her interpretation includes an extremely narrow scope of traditionally associated people for the Park. IRFFA disagrees with the Superintendent's selective interpretation of traditionally associated peoples on Isle Royale. IRFFA requests that NPS authorize an independent third party review of the Superintendent's TAP ruling.
- -TAP ruling report- The primary document referenced in Superintendent Green's ruling is an internal NPS TAP report. The

report is rife with personal opinion, is insulting, and references the author's own previous written work to substantiate his opinions. In addition, the report defies the first principle of research stated in NPS-28, Chapter 10 "The collaborative and open character of park ethnography must be continually stressed to ensure that communities whose heritage resources and associated lifeways are being studied understand and participate in the studies as early and in as many ways as possible." No IRFFA members or potential TAP stakeholders were informed, interviewed, or contacted for the NPS internal TAP report. IRFFA requests that NPS authorize a thorough and independent professional review of the peoples and communities associated with Isle Royale.

-TAP ruling information request- In response to our concerns about Superintendent Green's ruling, IRFFA submitted a formal request for supporting documentation related to the TAP designation process and ruling. Seven months later our FOIA request remains unfilled. Without this information, we will have difficulty addressing the TAP issue. IRFFA requests that NPS facilitate release of the requested information.

# Newsletter statements

Statements made in IRNP's most recent CRMP newsletter raised several concerns with IRFFA's membership.

- -Alternatives clarification- The newsletter gives the impression that NPS has developed and identified the CRMP alternatives already. IRFFA requests that NPS clarify that the alternatives are not truly "alternatives" at this point, simple a "shell that needs to be fleshed out."
- -Peoples, and lifeways- The newsletter focuses attention exclusively on potential structural, and landscape (Place), and/or programmatic cultural resource preservation. It is silent regarding potential peoples and lifeways preservation. As summarized in the first paragraph of NPS-28, Chapter 10: "Attention to the peoples whose lifeways are traditionally associated with resources under National Park Service stewardship is mandated in legislation and NPS policies". IRFFA requests that NPS include peoples and lifeways in the CRMP discussions.
- -All private activities on the Island will end- The newsletter suggests that all private activities associated with cultural resources will end when the remaining leases, SUPs, and VIP agreements conclude. IRFFA suggests that the conclusion of existing private contracts doesn't have to or should translate to no future private activities. IRFFA requests NPS to clarify that private activities on Isle Royale may be permitted in the future if they are consistent with CRMP goals and regulations.
- -Commercial Fishing exception- NPS Director Conrad Wirth developed a Commercial Fishing policy for Isle Royale in 1955. The policy noted the public interest in the activity and economic benefits to the nation and called for Commercial Fishing to continue as long as possible. In addition, Congress passed the Federal Fish and Wildlife Act in 1956 that together with CFR part 20(1959), 39 stat. 535, creating a special use permit system for private Michigan-licensed fishermen allowing them to continue fishing on Isle Royale. IRFFA requests that NPS clearly identify, document, and support long-standing NPS policy and congressional action that prioritizes continued Commercial Fishing by private individuals on Isle Royale as long as possible.

# Cultural Resources today at Isle Royale

- -Cultural resources in critical conditions- a 2011 study by the National Parks Conservation Association found that cultural resources in the 80 national parks examined were in poor condition or worse. Of these 80 parks, 91 percent had cultural resources in fair or poor condition. Isle Royale's cultural resources were ranked dead last, in critical condition. The responsibility lies with the National Park Service.
- -Minimal Impact- The park areas occupied by Isle Royale Families make up about four-hundredth of 1 percent of the park's area. Over many decades their primitive cabins have been maintained and their wilderness activities carried on with no detrimental effects on Park values. Over five generations families and volunteer friends have shown that they appreciate the remote and unique character of life in this isolated wilderness.

# Congressional Action

Because the CRMP process may not provide for the continuing presence of families and their successors who have kept faith with Isle Royale's cultural heritage, Congressional action may be required and should be on the table. Such a remedy must be sought especially if existing IRNP wilderness legislation puts critical cultural resources at risk. The family life cultural resources of Isle Royale are too significant to be allowed to be lost forever.

Correspondence ID:

64 **Project:** 33691 **Document:** 55915

Received:

Nov,12,2013 00:00:00 Letter

Correspondence Type: Correspondence:

2. First Choice Alt C

4. Because this park has low visitation it is important to develop apps or other electronic media to tell stories of the Island

Correspondence ID:

65 **Project:** 33691 **Document:** 55915

**Received:** Nov,14,2013 00:00:00

Correspondence Type: Transcript

Correspondence: Compiled comments from the public meeting #2 in Chelsea, MI on November 14, 2013.

Alternative A

40 years after A is D

Historic structures, including fire towers and fisheries, enhance wilderness experience and the families contribute as "living historics"

Want to see historic ([unreadable] cabins) structures stay but might feel different if purchased/built after park

Want to see historic rec. cabins removed as Isle Royale is wilderness. Commercial fisheries can stay as this is a different story.

# Alternative B

There are people historically associated with historic properties at ISRO who have value in helping NPS preserve these properties.

Families are a [unreadable] service in emergency situations, families at ISRO help visitor distress

Summer people can be [unreadable] into programs that help preserve or assist park visitors on waters at ISRO

B looks like the most expensive, this is perception is it doable?

Perception that other alternatives had more detail [unreadable] or alternative B more general not seeing visitor experience

Positive more if the historic is preserved by these resources

This option preserves options for future, more of the stories too

Kept more cabins open more chance for field schools for the care of historic structures

More possibility of developing number of partnerships for mutual benefits

B could stall things for a while if to make work need creative management. Need more than a reactive mode of operating, but may be delayed and get resources needed.

What should happen [unreadable] that should benefit ISRO working these alternative

This would help get comments and develop interests with all powerpoint and make images that [unreadable] for years and beyond

Are there enough places to stay on island, can you preserve some of these places as a condition to rent out and generate income Families could still have access and help people stay there

Does not think cabins and historic resources diminish wilderness in any way, they represent people interacting with wilderness as part of wilderness. Commenter included in preserving structures IRRAs. Institute kayakers come by interested in [unreadable] to know about them, stay in them, want to know who owns.

# Alternative (

Because more people would go want the numbers to stay low. People can learn or do the history elsewhere, learn about shipwrecks. [Unreadable]

Prefer no action alt, let them rot.

Visited once. B

Why put limited resources out cultural side when natural side makes a big differ.. no-action.

Cabins and mining historic, don't need to fill in the holes, don't have people living, rent them to people.

Backpacker want to see all of the resources remain, partnerships

Need lodge

No wilderness encroachment, dilapidated structures-remove, keep it so its stabilization

Public access television post all presentations. Target [unreadable]

Suggest Madison for meetings

Commercialization and would bring a lot of people and that would be bad

It is not specific to Isle Royale [unreadable] it in other places

B could be spread ourselves too thin-sounds like no priorities

The cultural things were a pleasant surprise

This alt [alt C] is narrow and limiting, a limited season

B and C combined could possibly work, and add the educational portion of D

Don't like it at all-would bring too many people to the island, it could be offered in other places, it would detract from the wilderness aspect

# Alternative D

asked about foundation and Alt D

# Actions Common to All

Enjoyed seeing the structures in wilderness, even the old lookout towers

Presentation on one of the old resort cabins, invited folks out to visit

Would like to see cabins preserved

Like a window

Think the cabins are very interesting and talking with families

Historic leasing may be an option, private, public, partnership

A few structures are windows into the past.

Interested in wilderness aspects. Doesn't want wilderness to get developed for partnerships, etc.

Not fond of D because it is putting the control in other groups' hands

Privatize donations, no strings attached

Not in favor of big groups

Doesn't want donors to tell us what to do

Appreciates the wilderness experience

Need to protect the wilderness

Camps are not the nicest, most well behaved

Values the quiet and wilderness, quiet, animals, geologic history is where it all starts

**Correspondence ID:** 66 **Project:** 33691 **Document:** 55915

**Received:** Nov,25,2013 00:00:00

Correspondence Type: Transcript

Correspondence: Compiled comments from the public meeting #3 in St. Paul, MN on November 19, 2013.

Alternative E

How do you exclude some aspects of history in other alternatives

Human habitation compatible with wilderness, discovery historic remains in wilderness is interesting not detracting

Boundary cultural pulled out building and history [?], wishes cabins left and used to generate revenue

I like the wilderness experience leaning toward the A concept, where much of the historic structures in wilderness go away Important to make decision to identify what you can preserve and let the rest go, this will create hard feelings but need a decision

Alternative C

Not in favor of singling out resources like this, doesn't like this alternative

Same thoughts on Arch, alt D because it's so narrow

B is the way to go-more balanced and relies on partnerships, aggressively seek partnership

Alt D and C are cop-out because we are narrowing the scope to be able to manage them

Anything that narrows the focus of cultural resources is dangerous

This one is a problem- top narrow- what happens to all the other resources

Likes the idea of preserving fisheries, but don't focus on it and take away from something else

What about lighthouses? Would we consider only keeping 2

You can't do everything

Educational experiences, we should build in some unique ed. Experiences in these, an app for example, where you are the captain of the AMERICA. These kinds of ideas could really hook more people in, or a fisherman pulling nets. Some ideas like they have at the Folk School might work.

Other comments: virtual tour of park asked for. More website information on cultural resources and natural resources would be great.

# Alternative I

What is the purpose of wilderness? To rewind [unreadable]? To erase what is there before?

One enjoys removals that allow for certain cult. Vegetations [?]

We are too Eurocentric [?]. We obsess over things that are important to us now and what it does for us personally. It's a glorification of ourselves. [unreadable]

Sees value in combining professional perspective and historic folks (tribal elders, summer cabin folks, etc) for discussion (oral histories, interp websites)

# Actions common to all

Likes alternative B. Enjoyed seeing cultural things in wilderness. Made them wonder how people had done it. Wouldn't want to remove all the buildings and then regret it later.

Correspondence ID: 67 Project: 33691 Document: 55915

Received:

Nov,20,2013 00:00:00

**Correspondence:** Transcript Correspondence: Compiled

Compiled comments from the public meeting #4 in Duluth, MN on November 20, 2013.

# Alternative A

Don't like this one- seems to be resource driven

Need to keep in touch with funding and visitation numbers- the visitation could change in each alternative

# Alternative B

How going to fund things when NPS very limited budget? Need to market history to expand interests and visitation to generate potential revenue and help to preserve cabins/fishing/etc

Concern with poor craftsmanship of [unreadable] at Crystal Cove

NPS let scholar stay at Anderson Fishery for years and let property run down, non family is out there restoring for the NPS, what about reciprocity?

# Alternative C

Bed and Breakfast at Rttavloor [?] Lighthouse, pay money for storm

Not interested, too narrow- not enough on historic mining

Buildings are an important way of learning history. Keep them for the generations to come.

Assessment fishing for the sake of traditional environmental knowledge should happen.

# Actions common to all

Who does the history belong to? The public!

If we don't preserve all of these places, the next generation will not be able to see it

Don't be shortsighted. In 100 years, the public will be able to see it.

Highly values the original

Important to keep all of them for the next generation.

What's the harm in having these little bits that are not wilderness

Correspondence ID: Received:

68 **Project:** 33691 **Document:** Nov,26,2013 00:00:00

Correspondence Type:

NOV,20,20

Correspondence:

1. I like the park service broad choices. No Action and Alt. A will not preserve or intentionally destroy significant cultural and historical sites. These are not ideal.

55915

Alt. B is preferred. If there are a lack of resources or partnership interests. Alt C is minimally acceptable.

2. B for reasons above.

4. Maritime resources at minimum should be preserved.

Correspondence ID:

69 **Project:** 33691

Document: 55915

Received: Correspondence Type: Nov,26,2013 00:00:00 Letter

Correspondence: Don

Don't change anything. What is happening now is fine.

**Correspondence ID:** Received:

**Project:** 33691 **Document:** 55915 **Private:** Y Nov,26,2013 00:00:00

**Correspondence Type:** 

Letter

Correspondence:

1. I like acknowledging the human history of Isle Royale. This can be done with photos and written accounts. It is not necessary to preserve buildings.

- 2. Alternative A is my preference. There are few wilderness areas east of the Mississippi River and wilderness is what is so rare and special about Isle Royale NP. Let it revert to wilderness to the maximum extent possible.
- 5. Rather than expending resources on buildings, backcountry trails and campsites need to be maintained. There is less damage wen hikers and backpackers can follow well defined trails and when campsites are well laid out.

Correspondence ID: Received:

33691 55915 Project: Document:

Nov,26,2013 00:00:00 Letter

Correspondence Type: Correspondence:

- 1. First and foremost, Isle Royale is a wilderness. Your alternatives vary in the degree to which they recognize this overriding management principle. In particular, I don't like the proposed alternatives which seem to turn the island into a kind of classroom overrun by screaming children and the like. Leave the island alone, and provide quiet, passive "interpretation" of resources.
- 2. Following on the above, Alternative "A" would be consistent with my views on the management of Isle Royale.
- 4. Right off the top of my head, I can only think of the copper mining artifacts on Island Mine as worthy of additional "interpretation" on the part of the NPS.
- 5. I have found the Windigo Building a little over the top (\$\$) and have wondered why that money could not have been better spent on trail maintenance.

Correspondence ID: Received:

**Project:** 33691 **Document:** 55915 Nov,26,2013 13:09:27

**Correspondence Type:** 

Web Form

Correspondence:

Topic Question 2:

Alternative B-having previously lived in western mountain states, I do not consider much of Isle Royale as wilderness; as it has been developed for mining, fishing, & logging, Secondly, it has long history of having Native American settlements which should be preserved(documented) for future generations.

Comments: I believe the Park Service interprets the term Wilderness different than I was previously taught as once an area was roaded (developed) it could not be determined Wilderness.

Thanks for keeping Isle Royale in good shape for us to enjoy.

**Correspondence ID:** Received:

Project: 33691 **Document:** Nov,20,2013 00:00:00

Correspondence Type:

Letter

Correspondence:

1. It seems well thought out and presents the alternatives in a clear, concise manner.

2. I prefer "B". On my many trips to ISRO (paddling and hiking), I've been disturbed that historic sites/fisheries/homesteads are deteriorating. I think that they have value by being restored without impacting the wilderness aspect of ISRO.

**Private:** 

Y

- 4. I was concerned when I visit Amagdaloid Island when I saw antique furniture stored in a building that was deteriorating.
- 5. Include "Minong" peoples sites.

**Correspondence ID:** 

55915 **Project:** 33691 **Document:** 

Nov 27 2013 19:49:09 Received:

**Correspondence Type:** Web Form

Correspondence: Topic Ouestion 1:

The wording seems a bit biased towards Alternative B. It's the only one that speaks of "a vibrant program". Are the others all less than vibrant?

Topic Ouestion 2:

I like Alternative D. An emphasis on the 4,500-plus years of pre-Columbian utilization seems much more compelling than the relatively short history of local occupation by recent settlers. Recent settlement activities should receive some continued coverage but are generally well enough documented.

Topic Question 3: I like Alternative D.

Topic Question 4:

Indigenous mine sites for sure.

Topic Question 5:

Please consider the "vibrant program" potential of Alternative D. The significance of Isle Royale transcends its recent place as an outpost of industrial society.

Comments: I am excited about the potential for tribal involvement and the promotion and preservation of traditional cultural knowledge and language. Also, emphasizing the long and enduring cultural legacy of indigenous people on the island will enhance and inspire my continuing interest in Minong (The Good Place).

Correspondence ID: Received: Correspondence Type:

Correspondence:

75 **Project:** 33691 **Document:** 55915

Nov,28,2013 11:05:08 Web Form Topic Question 1: QUESTION 1

Actions Common to All: I'm glad to see the inventory of ethnographic resources included here. I think it is absolutely critical to achieve this research/documentation as soon as possible, especially because the individuals who have first-hand knowledge of the history are quickly aging and dying. It would be a shame to lose all of their experience and knowledge while we still have time to document it. I also like that there is a clear statement regarding private use of cabins. I think it is completely appropriate for the park to end those agreements upon expiration, as it is legally bound to do. Special exceptions have gone on long enough, especially considering that most of them do not provide significant benefit to either the park's interests or the general public vicitors.

No Action Alternative: I do not like that this alternative fails to establish priorities for cultural resource management. I think it is critical to examine the big picture to determine which resources are most unique and vital for telling the park's history, and then focus on those. The reactive strategy suggested here will lead to poor decision-making, wasted resources, and haphazard/disconnected outcomes in the long run. There needs to be an overarching strategy based on carefully developed priorities. I understand that a "no-action" alternative has to be included, but please don't let this be the final plan!

Alternative A: I dislike that this alternative relies solely on traditional means of funding through the park service. Traditional NPS funding has been grossly insufficient in the past and will probably continue to be insufficient in the future. Developing outside partnerships with non-profits, universities, and other groups will be critical going forward if you want to actually accomplish anything. I am in favor of the aspect of this alternative that allows for structures to be removed in designated wilderness. This is somewhat of a "necessary evil" given the limited funding/resources the park has to work with. However, it is important to properly document everything before it is destroyed or allowed to deteriorate. I also believe there should be some consideration given to making exceptions for a few unique, well-preserved, important, one-of-a-kind resources that happen to be located in wilderness. (I don't know what those would be.) Perhaps their uniqueness justifies allowing them to remain, or perhaps they could be relocated to a non-wilderness area instead of destroying them. Also, please consider that as a significant number of structures are removed, there is a danger of some stories being lost just because all the related artifacts happen to be located in designated wilderness. As I see it, the goal of removing structures is to prioritize use of funds to better preserve and interpret a smaller number of resources - not to pick and choose some stories over others. Consideration of redundancy is also important - is it really necessary to have four lighthouses and forty summer homes, no matter how special each of them is on it's own?

Alternative B: I like that this alternative discusses establishing outside partnerships. As mentioned above, this will be critical going forward given the relative lack of NPS funding. I also like that preserving "the entire scope of human history" is specifically set out as a goal. I think this is one of the most important points for me - that ALL the stories are documented, preserved in some way, and shared with the public. I also like the idea of expanding interpretation activities and educational programs. I dislike that this alternative seems to aim to keep all or most historic structures. Quite frankly, even with outside funding this is not going to be practical in the long run. Again, the park needs to look at the big picture of all the cultural resources and prioritize what should be kept to best tell the history.

Alternative C: I like the concept of the universal theme of human interaction with Lake Superior and water resources. It is something that today's visitors can easily relate to, after having crossed the lake on the ferry to get to the island, or having gone fishing during their trip. This is a good theme to use for interpretive materials and programs. However, I feel it is too restrictive to be the guiding theme for management of all cultural resources. I feel strongly that all the stories need to be told, and this alternative seems to eliminate a lot of them (for example, copper mining and the CCC camps). I do like that this alternative includes some new and exciting ideas for visitor experiences (field schools, lighthouse stays, demonstration fishery, etc.) and that partnerships would be developed with outside organizations.

Alternative D: I think gaining more information about the prehistoric period on Isle Royale is very important and this research should be expanded and continued. I also think it's important to do a better job of telling this story to visitors. Having seen the interpretive materials in the visitor centers, how much is related to archaeology and prehistory? Practically nothing, which is a shame, as it should have an equal place with mining, fishing, logging, and tourism. However, as mentioned above, the archaeology theme should not be to the exclusion of the other stories, all need to be represented. Again, this alternative depends on developing outside partnerships, which I think is a good idea considering the limitations of NPS funding and the opportunity for enhanced visitor experiences (field schools).

Topic Question 2: OUESTION 2

My preference is Alternative B because it focuses on preserving all aspects of the island's history, expanding visitor education, and developing strong outside partnerships to make this happen. However, I would like to combine some ideas from the other alternatives. Specifically, an increase in archaeology research (Alt. D) is crucial since so little has been done to this point. And removing a significant number of structures in designated wilderness (Alt. A) after careful prioritization is also an appropriate goal.

# Topic Question 3:

# **QUESTION 3**

I would like to see the plan address developing priorities for research, preservation, and interpretation based on different potential funding levels. For instance, if you have \$1 million to work with, what will be the first priorities in each area? All three of these actions (research, preservation, and interpretation) should play equal parts in any plan.

# Topic Question 4:

# QUESTION 4

As already mentioned, it is most important to me to preserve some examples from each theme or story. Also consider geographical spread - meaning, don't only keep structures in the Rock Harbor and Windigo area. One resource that I would prioritize is the Edison fishery. It is a good collection of buildings, easily accessible to the public, well-preserved, and tells a good story. Even better would be having a demonstration fisherman back in residence to really bring the story alive. I'm also partial to Rock of Ages lighthouse, so dramatic out there, and relates well to the story of the multiple shipwrecks around it. The plan should address what will happen with historic structures in wilderness that are currently used by researchers, i.e. Bangsund Cabin, Edwards Island, and Davidson Island. The research conducted by these people is directly useful to the park, and the relationships should be continued into the future. However, this does not necessarily mean that those particular structures need to be preserved, rather that the park should still facilitate their research by providing a place to stay that meets their needs.

# Topic Question 5:

# QÚESTION 5

The park needs to make a much greater effort to share this information with the public.

Rather, I think the meeting announcement was put out too late and was very poorly disseminated, and most of those in attendance found out about it one of two ways: a) because they have a personal stake in the park's decision (i.e. life lease families) and therefore closely monitor the park website, or b) because they personally know an Isle Royale employee or CRMP committee member. To be honest, it feels like the park is not actually interested in hearing public comment because it would be easier not to deal with the potential for angry people and bad publicity. I think the park is trying to do the minimal possible as far as soliciting public comment, only enough to satisfy the legal requirement. If you really wanted public input, you would make it widely-known and easily accessible.

The newsletter is pretty good, but should provide more information and fewer photos. For example, there is significant discussion of different management strategies in non-wilderness, potential wilderness, and wilderness but there is no way for the public to know where those different areas are. Why not put a map in the newsletter showing that, as was included in the public information session presentation? It is publicly available knowledge, so make it publicly available so people have all the relevant information. Again, this makes me think that the park is carefully limiting what information is released to the public so they don't have to deal with negative comments and controversy. Please make the process more open and transparent!

# Comments:

Correspondence ID:

76 **Project:** 33691 **Document:** 55915

Received: Correspondence Type:

Nov,28,2013 12:23:38 Web Form

Correspondence: T

Topic Question 1:

The document is simple and readable. It seems to address the full spectrum of treatment alternatives.

# Topic Question 2:

Alternative B, because it addresses the identification, assessment, designation, protection, preservation, and interpretation of sites and landscapes representing all aspects of human history on Isle Royale. I think the park has great opportunity for enlisting the aide of partnerships here, just as Sleeping Bear Dunes National Lakeshore and its advocates were able to secure outside help to stabilize and rehabilitate historic structures in key locations at the lakeshore.

# Topic Ouestion 3

The professional services of a certified folklorist would benefit work on Isle Royale as it did at Fishtown in Leland. The stories a folklorist can collect helps place human activity and its relationship to nature in a broad historical context. See Laurie Kay Sommers, Fishtown: Leland, Michigan's Historic Fishery (2012)

# Topic Question 4

Working with an up-to-date List of Classified Structures that includes vernacular structures and landscapes, rank those listed on or eligible for listing on the National Register of Historic Places as highest priority.

# Topic Ouestion 5:

The park might find that extending some leases and special use permits would present the opportunity for private maintenance (but according to preservation standards) until it has other protective mechanisms, like partnerships, in hand.

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Comments:

Correspondence ID: Received:

77 **Project:** 33691 **Document:** Dec,01,2013 10:10:40

Correspondence Type: Correspondence:

Web Form

Topic Question 1:

I think that Alternative B is the best choice, and by the wording in the newsletter, it seems like the NPS likes it the best as well. The partnerships can be used to the park's advantage because the park does not need to allocate as many resources to each project. Alternative A sounds short-sighted. If the partnerships are there, we should encourage as many partnerships as possible. Isle Royale is a very unique National Park in many ways, and its varied history of settlers, vacationers, miners, and fishermen should be reflected in the park. Wilderness is an important part of Isle Royale, but I don't feel that supporting historic sites will detract from that wilderness. I think Alternative C is fine, but like I mentioned above, the fishing/maritime history on Isle Royale is just one aspect of its rich history. Alternatives B and D both say many structures would be allowed to deteriorate or would be removed, which is a tragic end to many structures that have survived so much.

# Topic Question 2:

Alternative B is the best choice. The use of partnerships and getting the public involved will, I think, give the park great flexibility in pursuing its long range goals. The more we can get the public involved, the better.

I think that the flexibility that Alternative B gives may allow for some increased attention on maritime or archeological projects (alternatives 3 and 4). By getting more people involved, the park's resources can be stretched much further, and perhaps alternatives 2, 3 and 4 are not mutually exclusive.

Comments: Keep the public involved. Parks are pointless without a public, and not everybody is interested in the camping/hiking aspect of Isle Royale. For example, history buffs could come out to Isle Royale and see what it was like during the fishing days, or the mining days, or the leisure days if there are buildings or sites that reflect those times. Some people can come out and work on the projects, and they would learn what Isle Royale had to offer during different time periods, or they can learn about the little niches of history that pop up around the island. If partners with the park can draw different aspects of the public to work and learn, especially kids and teenagers (boy scouts, girl scouts, vo-tech schools, even universities or colleges), or anybody that is interested, the Cultural Resources Management Plan will succeed. Alternative B seems to be the plan that can best involve the public.

If the public is only allowed to pass through a park, the park is an abstract concept, and the people walking through leave no trace. The same is true in reverse; the park leaves no trace on the person. However, if somebody comes to a park and is able to contribute something positive to that park, it becomes a special place, and the bond between park and person is strengthened. Building these lifetime partnerships between people and park will keep both sides stronger than ever.

Correspondence ID:

Project: 33691

Received: Correspondence Type: Correspondence:

Dec,01,2013 10:22:20 Web Form

Topic Question 1: 1a. I liked the variety of cultural resources described across the alternatives.

**Document:** 

1b. I do not like that they are separated into different alternatives. It would seem to me that the alternatives could have been separated by potential for increased funding or number of visitors to the park.

55915

# Topic Question 2:

2. Alternative B is the only alternative that strives to look at all Cultural Resources to preserve the variety of historical resources important to the cultural story of Isle Royale. The whole story of this landscape and the influence of humans on this wilderness long ago, now, and into the future is very important to Isle Royale as a NATIONAL Park. However, human history is not just structures. The breadth of social groups and their interconnections on and off the Island should be stressed more in this alternative and possibly other alternatives.

# Topic Ouestion 3:

3. The alternatives and the document as a whole do not address how the park's choices will affect future number of visitors to the Island. This park is for the people so how will the choice of one alternative over others (and the partnerships that will be established) increase the number and variety of visitors to Isle Royale. Since the Island is presently known for its unique island landscape and specifically the wolf/moose population, can there be other marketing opportunities of its cultural resources that makes this national treasure more visible to the people? I would say there is and that these efforts/partnerships should increase its visibility, as well as number of visitors and revenues to the park. This will in turn increase Isle Royale's budget and its efforts towards maintaining and preserving the present cultural resources and human history of Isle Royale.

# Topic Question 4:

4. When the park was established there were significantly more structures on the landscape - At that time it was viewed as a "wild" place. Since the 1940s many buildings have been destroyed, fewer persons on large and small boats visit the island, and many resorts that catered to many more visitors have been destroyed. The question is: do we presently have a good representation of the historic and archeological history of Isle Royale and the human influence on an island wilderness? I would say yes! But to maintain the present buildings and the history of the people that lived in these places, the park will have to be very creative in its establishment of partnerships to maintain and market its cultural resources - I think they can do this with input from many sources. More detail is needed in each alternative as to what specific partnerships and marketing efforts will be established.

# Topic Question 5:

5. Under the heading of Inventory of Ethnographic Resources, the park says that they will only consult with traditionally associated people/tribes. Thus, the ethnographic inventory will leave out the families who have/had cabins in the park and who have added to the history of Isle Royale before and after it was made a park/wilderness. You need to either consider these families traditionally associated people or add the consultation of the Isle Royale Friends and Families group in your

ethnographic assessment.

Additionally, why not have field schools for all alternatives, not just Alternative D.

The alternatives are not consistent in their verbage - maybe this is due different authors for each alternative? More consistent text/editing is needed among the alternatives.

Comments: Isle Royale has one of the richest human histories of most national parks; yet the park has not developed many interpretative programs on its cultural resource to attract visitors to the park until the CRMP process started. I hope that with this process and the alternative that is chosen, Isle Royale will experience increased national and international visibility for its cultural resources.

Correspondence ID: Received:

: 79 D Project:

Correspondence Type: Correspondence: Dec,01,2013 10:56:56 Web Form Topic Question 1: I support Plan B!!

Comments:

Correspondence ID:

80 Project:

33691

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**Document:** 

**Document:** 

55915

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Received: Correspondence Type: Correspondence: Dec,01,2013 00:00:00 Web Form

Topic Question 1:

1. Î am pleased to see the alternative concepts established by the team. Isle Royale has a wealth of historic property and archeological sites that should not be ignored. I certainly believe the the No-action alternative is a poor choice and that a lot can be accomplished within the other alternatives. It is of utmost importance that partnerships be developed and/or expanded to accomplish the objectives.

# Topic Question 2:

2. I am not interested in seeing the development of alternative B.

we can't undo the past. We can, however, learn from our mistakes,

and not make the same mistakes now and in the future. There are still many historic buildings that need to be preserved or renovated, and not be allowed to deteriorate or be destroyed.

much work has been done by individuals and groups, such as that done, for example, on Washington Island, and Barnum Island.

# Topic Question 3:

3. I am pleased to see that increased communication is beginning to occur with commercial fishing families, historic preservation people, and other organizations that could expand the alternatives. I am very disappointed in the position taken regarding life leases, special use permits, and the volunteer-in-park agreements. It has been acknowledged that the NPS does not have the time or resources to preserve these historic sites. What has been preserved in years past, has largely been through the efforts of traditionally

associated persons and their descendants. What is the value of opposing the efforts of these persons who are willing to try and preserve these historic sites. On the contrary, they should be expanded. I don't believe that there would be any opposition from the position that special privilges are being or would be extended to these individuals as has been suggested.

# Topic Question 4:

4. I frequently use the screen shelters at Grace and Beaver Island.

I would like to see a few

more screen shelters at places such as Thompson and Johns Island. In an effort to preserve the historic buildings, I would not favor shelters at Washington or Barnum Island.

Topic Question 5:

Comments:

Correspondence ID: Received:

81 **Project:** Dec,01,2013 19:04:45

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Correspondence Type: Web Form

71,2013 1

# Correspondence:

No doubt the island is a special place due to its' natural beauty and history, all of which should be preserved. For this the DNR should be complemented. However one of the amazing resources I was fortunate to experience was the community of Tobin Harbor... the people and heir culture. Diverse backgrounds ranging from old commercial fishermen (and wives), school teachers and families that had been coming to the island since the 1930's, former Postmaster General, naval architect and many others. These people represent a wonderful natural resource that is as important as the natural beauty of island, one that should be nourished and maintained. Fortunately, some of the island's resident's remain and continue the legacy of their families. That of understanding and nurturing their coexistence with the special place called Isle Royale. These people and their history are as important to the island as the moose, trees, fish and other natural beauty. To lose this history would be a tragedy and diminish the island's beauty. Those families that have historic ties to the island should be allowed to continue using their family cabins and continue the rich tradition of community that is as much a part of the island as the trocks, trees and water. Preserve and nurture the island's culture along with its natural resources.

Correspondence ID: Received: Correspondence Type: Correspondence:



I feel that our generation has a moral obligation to restore and preserve as many historic structures and cultural resources as possible on Isle Royale including maritime resources and archeological resources for future generations of children to learn from and experience.

The National Park Service has one last opportunity to save one of the most unique and historically accurate and intact cultural structures in the nation. The traditional people of Isle Royale have managed to preserve these structures and culture for the past 128 years. LETS NOT BE SHORT SIGHTED AND LOOSE THEM NOW!

Isle Royale is about 99.9% wilderness. Preserving structures in potential wilderness sites would in no way take away from the wilderness experience. It would be very easy to apply rules to these sites such as no modern conveniences, no generators, no antennas, no television dishes, no planes etc. and keep them very, very close to the wilderness designation and yet preserve historic structures in remote surroundings. Most of these structures are very, very small and hardly visible and do not take away from the wilderness designation.

The public has many, many acres of wilderness to explore outside of a handful of valuable historic sites in order to have a wilderness experience. These sites have been in the 'wilderness for 100 years or more and have not harmed the wilderness experience nor the wilderness. Most of these sites are not on the main land anyway. Most sites are only accessible by boat so they will not negatively impact the wilderness restrictions.

The NPS cannot preserve all of these historic structures on their own. Therefore, I would support Alternative B. The NPS should develop partnerships with willing participants to stabilize, restore and maintain these historic structures and artifacts into the future

A good example of this type of partnership that has worked very well was started in 1996 by the Johns Hotel Historic Point Association which is a nonprofit 501c3 organization and the NPS. Since 1996, the historic Johns Hotel on Barnum Island and the Historic Johns camp building on Johns Island have been saved from complete deterioration. The NPS has invested its resources of labor and money into the Johns Hotel and the Johns Hotel Historic Point Ass. has invested their resources of money and labor over the years. Both entities working together have produced an example of a very successful partnership and preserved some of the most historic buildings on Isle Royale. The NPS, in the past, has used members of the Association to give presentations at the Windigo Ranger station to the public on the history of the Johns Hotel. Members of the Association have giving many tours of the historic buildings in Washington Harbor. The public really enjoyed the presentations and tours and were extremely interested in its history. \*Note: The Johns Hotel was a vacant building in 1996 and is presently uninhabitable while under restoration.

We need to duplicate this type of partnership in order to preserve the cultural resources on Isle Royale. Also, the Johns Hotel history includes a unique combination of a traditional people who were involved in mining, the tourist industry, the fishing industry and even homesteaded on Isle Royale starting in about 1865. Homesteading meant that a family had to occupy their land from early, early spring through December and grow crops and animals etc. on the land. It was a very, very difficult lifestyle.

Suggestions for the future: The Johns Hotel Historical Point Ass. has access to many historic boats and artifacts that can be returned to Isle Royale and shared with the public in the future if a partnership can be continued with the NPS. These original artifacts could be added to and intertwined with the Johns Hotel history of traditional people on Isle Royale and be of great value for future generations to experience and enjoy

Also, the Association would be in favor of reaching out to organizations such as Upward Bound, the Boy Scouts, a church group, or college group in order to involve them in the future restoration and maintenance of structures in Washington Harbor and Johns Island. This expanded partnership would be a great asset for the park and the public. It could involve the public, especially students and young adults, in a wonderful experience on Isle Royale with little cost or work for the NPS.

The students could be involved with many aspects of the park. They can develop carpentry and building skills by safely working on historic buildings. They can learn the history of the buildings and research correct restoration processes of historic structures.

They can do career exploration by spending a short period of time job shadowing with park personnel. They can fish, hike, camp and do some boating under supervision. The students would have to be age appropriate for each situation. For many of the students, it would be a first time experience in many of these activities. They could even sit around a camp fire together and experience what previous generations of families thought and felt many years ago while living on Isle Royale.

All restoration, maintenance and activities would need NPS approval, but could be coordinated by the Johns Hotel Historical Point Association members and supervised by the volunteer organization personnel and a member of the Association. (Again, not a lot of work would be required by NPS employees). A member of the Johns Hotel Historical Point Association can handle all needed arrangements.

The Johns Hotel Historical Point Association would be interested in transitioning from VIP status to a more defined partnership to continue to restore and maintain historical structures on Isle Royale and preserve a small piece of history for future generations of Americans.

**Correspondence ID:** 

83 **Project:** 33691 **Document:** 55915

Received: Correspondence Type: Correspondence: Dec,02,2013 10:05:07 Web Form Topic Question 1:

I believe plan B is a good plan for preserving history!

Comments:

Correspondence ID:

84 **Project:** 33691 **Document:** 55915

Received: Correspondence Type: Correspondence: Dec,02,2013 00:00:00 Letter

1. I don't think alternative "A" would be economically feasible. Funding and operation of this plan by traditional means through NPS project funding and staffing would be extremely difficult. At this time I know funding is restricted and the staff is being reduced.

- 2. I favor alternative "B" mainly because it is the most ambitious. But by no means does this reduce the value of the other alternatives.
- 3. In regards to managing Isle Royale, here the guiding principle should be patience. In these times when economic integrity must be maintained, it will no doubt take many years to achieve these aims. The "development of a vibrant program of partnerships and agreements/ opportunities for private or nonprofit organizations that help achieve these preservation goals," is a concept I highly endorse. It will help financially and provide the "sweat equity" necessary to be successful. In addition it provides a broader public appreciation of Isle Royale's scenic qualities, solitude, recreation, and historic values.
- 4. They all have sound, defensible points.
- 5. Every alternative has points well worth considering, and it would be a shame that some be sacrificed for the sake of another plan. Every consideration has contributed to the character and personality of Isle Royale. Please do not let the definition of "wilderness" restrict the story Isle Royale has to say.

Correspondence ID:

85 **Project:** 33691 **Document:** 55915 Dec,02,2013 14:54:31

Received: Correspondence Type: Correspondence:

Web Form

Topic Question 1:

1. Comments are invited, yet instructions are unclear, and the alternatives are too numerous and too difficult to understand. It's as if you've gone out of your way to make it difficult to comment or respond.

# Topic Question 2:

2. Yes, I like Alternative B because of the potential for elimination of wilderness designation around cultural resource areas, and the continued use of cultural areas in partnership with maintenance and repair users.

# Topic Question 3:

3. We believe that the wilderness designation should be eliminated by Congress for the cultural resource areas, and managed equally by the Park Service and not put in the "back seat" of the management plan. Possibly including the cultural resource properties as part of the lodging lease properties managed by Park Service vendors, thereby affording future taxpaying citizens the opportunity to experience what life lessees have experienced since the 1930s.

# Topic Question 4:

4. All of the cultural resource properties for the reasons stated above. We feel that it is impossible to separate cultural resources from wilderness. Neither will stand alone as well as they do stand together, with tourism and recreation.

Topic Question 5:

Comments: some of the most enjoyable time was spent in speaking with some of the life lessees, about the history and background of this wonderful island. That history

MUST be preserved by maintaining the cultural resources.

Correspondence ID: Received: Correspondence Type:

Correspondence:

86 **Project:** 33691 **Document:** 55915 Dec.02.2013 16:54:49

Dec,02,2013 16:54:49 Web Form

Topic Question 1:

1. Many of the cultural resources may be preserved under the proposed Alternatives, however individual alternatives are not detailed enough and do not support all cultural resources. Some of the Alternatives are specific, and others are general. It appears that different alternatives were assigned to different members of the nps team to draft. To develop specific alternatives, further ethnographic review is required, and is mandated by law, policy and regulation. Saying that all the laws cannot be followed is just an excuse. The NPS cannot afford many of the proposed actions as stated in the Alternatives, so I question whether this is realistic planning at all levels. The only way that you can preserve the cultural resources(one of the NPS mandates) is to form true partnerships. Fund raising, management, and actual hands-on maintenance will all be required. The stated willingness to form those partnerships is a positive. There are many examples of such partnerships already in place in many national parks, so that is doable.

# Topic Question 2

Alternative B is preferable, however it again is too limiting. Passive language is used in this alternative, as it is in all of the others. So when I read "...would prepare..." or "...would stabilize...", I take that to be a qualifier, and it minimizes the value of this plan. If you are going to do something, then say so. If it is simply a pie in the sky plan, then tell people that you can only do the plan with adequate funding. The word "would" implies that what is stated will only be done if some other thing happens. Is that the case?

# Topic Question 3:

I believe that all the Wilderness Camps should be preserved. Utilize the IRFFA organization to manage the maintenance of the camps under the umbrella of a 501.c.3 organization. Work with them to mandate a formal management structure with accountability for completion and appropriate maintenance. Develop mandatory action plans, with NPS oversight. Utilize the expertise that has developed within the 4-6 generations of individual families. Develop volunteer processes that will be utilized with each structure. There has to be some kind of family continuity or the personal items which are so much of the story will not remain. I am not suggesting exclusive use, simply on-going family involvement. Go to Congress, remove all cultural resource areas from wilderness and manage them. None of Isle Royale was wilderness in 1940. It only became wilderness after the 1964 Wilderness Act, and the subsequent lines were drawn in 1976.

# Topic Question 4:

All of the existing sound structures should be maintained. In my lifetime, I have seen the CCC structures at Siskiwit Bay removed by the Park Service, the Savage Boat House allowed to collapse and then removed by the Park Service, several houses in Rock Harbor removed or burned by the Park Service, the Birch Island log cabin belonging to Linkletter burned, and a number of other structures burned, collapsed and removed, or simply allowed to decay. The NPS has been the greatest concern to date, and needs to start doing what they are mandated to do....to protect.

# Topic Question 5:

I think about what I have found the most interesting through the years I have spent at the island, and one of the most important is the fishing history. I remember being fascinated seeing Milford Johnson, or Art Mattson, or the Sivertson fishery loading boxed and barreled fish on the Voyageur. Huge blocks of ice were often dropped off. The smell of fish was something your rarely experienced. It wasn't bad, just different. I would like to see the return of a commercial fishing operation at each end of the island

Comments: If the cultural resources are really to be preserved at Isle Royale, and the CRMP does not simply become a Cultural Resource Removal Plan, then everyone needs to sit down and come up with some creative solutions to the funding, maintenance and rights that all citizens have to these resources. It can be done, you have to be willing to do so. I think that taking the resources out of wilderness can be done in Congress, and should be done, and then the resource managed accordingly. You must be willing to stick out your neck and take the required steps, but it is doable. You have a core of dedicated and willing families, volunteers, and visitors.

Correspondence ID: Received: Correspondence Type: Correspondence: 87 **Project:** 33691 **Document:** 5591. Dec.02.2013 19:14:55

Web Form

Topic Question 1:

I am happy to see that in general, the alternatives seek to preserve historic sites on Isle Royale. I believe it is important to acknowledge that before Isle Royale was a national park, it was a home and a livelihood to many people. Ignoring that part of Isle Royale's history would do a disservice to those seeking to experience its beauty and solitude. By preserving Isle Royale's ties to its past residents, visitors are able to see not only the scenic beauty of the land, but the historic relevance of it as well. I appreciate the openness to partnerships seen in some of the alternatives. I believe it is very important for the national park to seek these partnerships amongst the US citizens for whom the park is preserved.

I do not like to see the word "deteriorate" used in the context of Isle Royale's historic structures. Allowing deterioration of these incredible and interesting artifacts would be very sad considering the families, companies, and organizations that would be willing to help preserve this important aspect of Isle Royale National Park.

# Topic Question 2

I strongly support alternative B which seeks to preserve a variety of historic properties that reflect the entire scope of human history at Isle Royale. I do not agree with the alternatives that aim to preserve only small microcosms of Isle Royale's diverse and rich history, doing so would not do justice to the dynamic human environment that the islands once supported. It would be very sad to see so many wonderful cultural resources allowed to deteriorate. Alternative B speaks strongly to me because it

would allow for retention of not only Isle Royale's prodigious wilderness, but also of its unique character and history. A national park by definition is a scenic or historically important area that is preserved by the government. Isle Royale currently possesses both scenic and historical value. Diminishing Isle Royale's unique and vibrant human history by allowing several historic properties to fade away, would essentially violate the essence of a national park. Isle Royale holds a very interesting and intriguing story that is further embellished by its many contacts with families, businesses, residents, and travelers. Alternative B is an excellent way to preserve those relationships held between Isle Royale and humans. Keeping the structures and stories alive will allow future generations to appreciate the profound impact people have had on this land and that the land has had on

# Topic Question 3:

Preserving the structures on Isle Royale is a large task. I believe it is important to acknowledge that while partnerships with organizations, universities, etc. will be essential, there is profound value in seeking partnership with the families involved in Isle Royale's rich history. History is not just something that happened hundreds of years ago, it is created each and every day that passes by. Isle Royale National Park has the unique opportunity to continue adding to its history by enlisting support from those that have a very deep connection to its past. By including the families that are related to Isle Royale's previous residents, the National Park will ensure careful continuation and preservation of its unique buildings, structures, and stories.

# Topic Question 4:

Since alternative B seeks to support the most historical properties, I think it is appropriate to say that not one structure is more important than another. Instead I think that all structures that could conceivably be restored should be considered for preservation, especially those that have already undergone active restoration or are undergoing such preservation now. It is also important that current partnerships be retained, as they will be very valuable as the park moves on to the future management of Isle Royale's cultural resources.

Comments:

Correspondence ID: Received:

**Correspondence Type:** Correspondence:

Project: Dec,02,2013 20:16:24

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Web Form Topic Question 1:

If I had never been to Isle Royale, Alternative C would completely turn me off. Why would I want to see a fake fishery or go to a pretend craft school in a National Park? To my eye, the proposals in C would degenerate the wilderness by creating expensive 'opportunities' for the wealthy to enjoy in an act-it-out environment. People who go to National Parks want a real experience, based on what is and has been, the individual park. There are numerous other places people can go to learn to make a canoe, sail, or stay in a lighthouse. Scuaba divers need to be experienced, and are able to access the boats now. More large tour boats to take amateurs scuba-sightseeing seems dangerous and irresponsible. To me, the ideas in Alternative C are the types of things that I visit national parks to escape.

Having no plan puts the entire park in limbo every time there is a change in management. This is, in the end, an ineffective and expensive solution.

Alternative D seems very narrow in focus, and a bit contradictory. Is the park service interested in the preservation of past cultures or removing parts of them and putting them in museums? Where would the museums that would presumably hold the inventory of ethnographic resources be?

# Topic Question 2:

As you might have guessed, it seems to me that Alternative C is the only reasonable alternative presented. The Island is a place to go for mental, physical, and spiritual renewal. This is as true now as it was 100 years ago. Visitors marvel when they realize that people made the trip to Isle Royale each year from points much farther south than Michigan or Minnesota, and spent months at a time, with children large and small, enjoying the remote solitude of the Isle. The remaining structures sprinkled around the island stand as a tribute to those who came before us. It is not an accident that virtually any publication one finds about Isle Royale feature at least a photo or two of an old, weathered building, dock or boat. Similarly, tourist cameras frequently take aim at the quaint structures in Tobin's Harbor while awaiting the prized moose shot.

Because I am sure that those involved in creating these alternatives are intelligent, insightful people with 'what's best for Isle Royale' at the forefront of their thinking, I am sure each alternative has its merits. Perhaps what is needed is a combination of all alternatives which could maximize the strengths of each.

It seems that this planning has taken years and years. Are there not other parks in this country which have guidelines for keeping the historical/cultural features alive while at the same time protecting the wilderness? Has IRNP sufficiently reviewed models of other parks facing similar questions?

Comments:

Correspondence ID: Received:

Correspondence:

Project: Dec,02,2013 20:59:33

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**Document:** 

**Correspondence Type:** Web Form Topic Question 1:

They are too vague and do not really define the concepts and details behind the plan or what each plan would conceptually

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achieve.

# Topic Ouestion 2:

I would prefer the No-Action Alternative. It blends both the maritime and hiking needs without one dominating the other.

# Topic Question 4:

It would be nice to have overnight docking on Wright Island and Crystal Cove. They are both beautiful areas and it would be nice to be able to enjoy them and have park rangers back on Malone and Amygdaloid channel ranger station.

Comments:

Correspondence ID: Received:

90 **Project:** 33691 **Document:** 55915

Received: Correspondence Type: Correspondence: Dec,03,2013 09:49:07 Web Form

Topic Question 1:

1) The alternative concepts encompass the entire range of possibilities, which I think is useful for planning purposes. As such, the alternatives provided tend toward extreme combinations of actions: Designated Wilderness (A), Onshore cultural facilities (B), Offshore cultural resources (C), and Prehistoric Archeology (D). To endorse any one of these divergent directions when the overarching Foundation Document is not yet available for public review seems imprudent.

# Topic Question 2:

2) Of the packaged alternatives, I prefer No Action with the addition of Prehistoric Archeology, because it is the least destructive alternative and it best preserves the status quo for all resources, including those associated with wilderness values as well as cultural resources. Alternative A (Wilderness) is too destructive of existing resources, most of which were in place when the Park was established and therefore not inimical to the "northwoods wilderness" which was touted as a major reason for Park establishment. It seems to me that the Wilderness Designations within ISRO were intended primarily as a brake on overambitious development schemes that might be launched at the initiative or with the blessing of the NPS, and not as a means to remove residual cultural resources that were in place when the Park was established and when Wilderness designations were put in place. In other words, Wilderness designations were instituted that more-or-less preserved the status quo, while preserving modest options for future "development" that might be considered by NPS. Alternative A (Wilderness) represents an overzealous interpretation of the Wilderness Act, in my opinion, and doesn't recognize the limitations inherent in the Wilderness designations, primarily the fact that the water surface doesn't receive the same consideration as the land surface. Aside from nowake zones, there are few if any restrictions on size and manner of boats on the water, and no restrictions that would limit frequency of boat traffic. Such restrictions would be impractical, in the context of Isle Royale. However, the audio and visual stimuli created by boat traffic certainly detract from the spirit of Wilderness designation, and this traffic is impossible to completely escape anywhere within the designated Wilderness. The increase in NPS infrastructure that would be necessary to follow alternatives B (onshore) and C (offshore) would further detract from the "northwoods wilderness" theme, as well as representing unrealistic expectations for the Park budget. Alternative D (prehistoric archeology) represents a relatively low-cost option that would greatly enhance public appreciation and scientific understanding of the scope and significance of human activities at Isle Royale at its earliest stage, something that was celebrated in the founding documents but has seen little activity or recognition since that time. Alternative D is a modest change from current management, and has the advantage that this initiative could be reversed at any time if that was deemed unwise to continue (e.g., in the unlikely situation that prehistoric archeological investigations proved relatively fruitless).

# Topic Question 3:

3) My preferred alternative would be a combination of No Action and Alternative D, for reasons described above.

# Topic Question 4:

4) The use and occupation of the site known as "Bangsund cabin" by wolf-moose researchers dates back to 1960. Following the death of commercial fisherman Jack Bangsund in 1959, with the encouragement and permission of park staff, researchers from Purdue University began using the site as a base of operations for summer field research associated a long-term study of wolves and moose. Since the late 1970s the site has continued to be used by the wolf-moose study (based at Michigan Technological University since 1975) under terms specified by a Cooperative Study Agreement between Isle Royale National Park and Michigan Tech. The site was included within Wilderness in 1976, and has seen continued use since that time through the consecutive administrations of seven Park Superintendents.

The values presently inherent in continued use and maintenance of the site and its facilities fall into four non-exclusive categories:

- 1) Scientific serves as a primary base of operations for ground personnel, staging area for volunteer field crews, rendering of animal carcasses, initial cleaning of moose bones for permanent collection, and storage and maintenance of field equipment.
- 2) Educational serves as a orientation site for volunteers engaged in citizen-science field initiatives, which have included about 800 individuals in the past 25 years.
- 3) Cultural a high level of historical integrity has been maintained for three buildings considered representative of the commercial fishing era of the 1920s and 1930s. Prior to this period the site was used as a historic and prehistoric encampment by native Americans, as explained in on-site interpretation.
- 4) Visitor experience provides a valuable opportunity for "transformative experiences" by visitors, readily documented by comments of >5,000 visitors in the past four years.

The emergent properties and values associated with the Bangsund site could not be maintained if the research activities were moved elsewhere in the Park. Use of the site has been a very successful merging of values by the NPS and a university partner, consistent with three (of a total of four) initiatives in the NPS Call to Action plan for the second century of the NPS: Connecting People to Parks, Advancing the Educational Mission, and Preserving America's Special Places.

# Topic Question 5:

5) The Foundation Document is not yet "publically available", and the public is being asked to accept as an article of faith that all the alternatives presented here are consistent with the "draft Foundation Document". The Foundation Document needs to be available for full public review and vetting, prior to further consideration of which aspects of current Park management should be altered.

Comments: I do not understand the distinction below in "How would you like to hear..." between "Email-NPS" and "Email-Other"

Correspondence ID:

91 **Project:** 33691 **Document:** 55915 Dec,03,2013 10:54:53

Received: Correspondence Type: Correspondence:

Web Form Topic Question 1:

They are distinct, yet seem crafted to focus, except for "B" on too narrow a range of resources for inclusion to the neglect of others, or do so little to preserve and protect and restore and interpret these resource, whether still extant or not, as to be ineffective

None of the plans identifies seems to attempt to list all known cultural and historical resources and make them available to the public. Furthermore, no plan seems to stress clear communications with the general public which have been lacking in the many decades I have been going to the island; i.e. too many misunderstandings due to poor communication and the whims of individual superintendents. NPS needs to acknowledge this in this document, however briefly. And, this document should clearly identify any decisions made that are less that the highest possible preservation by indicating specifically which plan, especially the wilderness management plan, prohibits such status. It being a goal, thus, of seeking revisions and exceptions under wilderness management to promote the betterment of cultural resource preservation.

# Topic Question 2:

I prefer the "B" alternative as it seems to be the most encompassing for actual preservation and interpretation for the general public as well as island visitors. The other alternatives do too little or are too confining in their focus, thus distorting the island's true history.

# Topic Question 3:

Would like to make sure that the final plan, preferably Alternative "B" as it might be modified, to be as broadly representative of Isle Royale's history and culture as possible. It should include specific plans to share via the Internet or other means, more of the lesser know aspects of the island without neglecting the better know resources.

# Topic Question 4:

Each of the lighthouses. Each of the shipwrecks. Each of the existing campsites and campgrounds, such as at Chippewa Harbor. There should be more interpretation at each of these sites presented in a way which makes it available, but it not intrusive upon one's outdoor experience.

# Topic Question 5:

- 1) NPS should acknowledge previous laxity in cultural and historical resource preservation.
- 2) Identify all, as well as possible, historical and cultural resources remaining and those which are known over its approximately 5,000 year history.
- 3) Identify which resources are no longer extant and why they are no longer extant, particularly highlighting any resource lost by direct NPS management decision, noting which documents authorized such action or inaction.
- 4)Include specifically with the plan how these resources, in their entirety, will be made available through interpretation in its various forms, especially print and the Internet, so that they get "equal billing" with wilderness themes.
- 5) With the idea of seeking changes to or exceptions from the Wilderness management plan, any resource which is being kept from its best and highest use by such plan should be specifically identified; truly by chapter and verse. Remember that the wilderness management cocept is but a modern shadow cast over an already existing mass of cultural and historic and geological resources that evolved long before wilderness designation. Yes, I am suggesting the wilderness plan be opened for revision, including adding several miles of additional hiking trails such as from Moskey Basin to the Rock Harbor Lighthouse and from there along the south shore to Chippewa Harbor and from Malone Bay to Senter Point/Island Mine trail.

Comments: Generally, what I am seeking is a full inventory of resources, that each resource be given an opportunity for its highest and best use despite any

other previous plans - - especially the wilderness plan.

I am look for NPS to acknowledge those previous decisions which were not in the best interest of resource preservation.

I am looking for NPS to cite specifically which sections of the Wilderness Act or previous management plans will not allow for a current highest and best use.

I am looking for resource preservation to be spread across the island and not just concentrated at Rock Harbor or Windigo.

I truly believe that very few island visitors would notice if there were 10,000 fewer trees found in a 10-foot wide trail some 30 miles long. Impact on wilderness experience would probably be enhanced. Impact on wildlife would be minimal. Access to more historical and cultural resources would be enhanced. For example, which should only those with their own boat or using the NPC ferry get to see the Rock Harbor Lighthouse Museum.

Correspondence ID: 92 Project: 33691 Document: 55915

Received: Dec,03,2013 11:48:06 **Correspondence Type:** Web Form Topic Question 1: Correspondence:

In all of the draft proposals there was something I liked and something I did not.

The do nothing or destroy approach has been the standard till now and some very interesting sites have been lost.

I like the idea of partnerships but am curious what that would mean. I think perhaps it would be different than that I would hope for. Where there would be a give and take and a balance. Not one side holding all the chips.

I think research on the island is important.

I think CULTURAL landscape is as important as the physical. As some say a rock is a rock is a rock, but when you know that rocks importance in the lives of those who live around it and who visit it, it has more depth of meaning. (for instance, Monument Rock)

I think a "faux history" is worse than no historical perspective. I think that is well illustrated by the Liberty Mutual ad that airs on PBS funding American Experience. Where a robotic model of Sacajawea or Paul Revere states a declarative sentence which is supposed to sum up their import. And the voice over states there is more to that person than that event. BUT if for instance commercial fishing were again allowed out of Isle Royale for a visitor to spend a week doing the real work of that activity and with out 21st century luxuries that would be a peek at the real deal.

really enjoyed the orchid class last June put on by IRKPA. Interestingly, the students I like the idea of classes. for tea and cookies, and found that the highlight of their class. Seeing us in our house doing and teacher stopped by what our great grandmother and all the following generations continue. And these were botanists not historians.

# Topic Question 2:

Alternative B probably comes closest, but misses the mark as little understanding of what goes into the upkeep and maintenance will be 100 years old and needs constant care and attention. And not some wood butcher coming in and whacking away with no understanding of what to use and the interdependence of all the parts.

# Topic Question 3:

Partnering with your consulting parties on taking the small part of the park which does have historically interesting buildings and remains out of the wilderness/potential wilderness demarcation. That way cultural activities could be managed more effectively especially in partnership.

Also doing a thorough ethnographic study of the remaining families and those who have been evicted from the park so that there is a full understanding of what you will lose if you do not/cannot/will not preserve it.

Redoing the TAP designation by someone who does actual interviews and studies so doing a thorough ethnographic study of the remaining families and those who have been evicted from the park so that there is a full understanding of what you will lose if you do not/cannot/will not preserve it.

I think they are all interesting. For instance I would like to be able to go to the Linkletter site. The aboriginal mine sites as well as the more recent ones are interesting. The CCC camps. The logging camps and explanation. And, of course, the commercial fishing camps as well as the "summer recreationalists".

Topic Ouestion 5:

as above

Comments: As above a real ethnographic study, a redo on the TAP, and also have all the consulting parties be consulting parties. I have found that different points of view at the table is always good for a process. Otherwise, large and small concepts will be missed.

**Correspondence ID:** Received:

93 Project: 33691 **Document:** 55915 Dec,03,2013 00:00:00

Correspondence Type: Correspondence:

1. I like a lot of the ideas presented in Alt conepts C and D. Craft school, educational opportunities, sailling, navigation, boat building, canoe rental, lighthouse keeper, scuba. Also, partnering with university of regional institutions. Have to see which have the most interest from people to participate.

- 2. I prefer alt B for its program of partnerships and preserving as many resources as possible. This plan conveys a sound range of experience at Isle Royale. Incorporating ideas from C and D into the plan seems like the ideal option.
- 3. Looks like you have lots of great ideas. Just need to decide which ones will work under cost constraints and partnerships available.

4. I don't know the island well enough to pick specific sites.

5. Interested in seeing this fantastic place become even more interesting to visit. Preserve, restore, and repurpose existing structures.

Correspondence ID:

Project:

33691

33691

55915

Received: **Correspondence Type:** Correspondence:

Dec.03.2013 00:00:00

Letter 1. Nice layout

2. I typically prefer tent camping, but the harsh environment makes cabins appropriate. Alt. A.

Document:

4. No

5. Excellent job

Correspondence ID: Received:

Project: Dec,03,2013 00:00:00

**Correspondence Type:** Correspondence:

Letter

2. B- like the public/private partnership ideas. I also like that you are not singling out a narrow history, but leaving interpretation open for a wider range of time.

55915

4. As part of fishing history - school in Chippewa Harbor, Amygdaloid settlement.

**Document:** 

Correspondence ID:

Received:

Project: 33691 Dec,03,2013 00:00:00

**Document:** 

55915

**Correspondence Type:** Correspondence:

Letter

1. It looks like all or most of the issues are covered in the concepts.

2. I think B makes the most of what resources are available. Partnerships should increase the park's ability to succeed.

4. I would like to see the lodge area maintained, or improved. That gives people like me an opportunity to enjoy the park experience.

Correspondence ID:

33691 Dec 03 2013 00:00:00

Document:

55915

Private:

Y

Received: **Correspondence Type:** 

97

Correspondence:

1. It appears that each concept was well thought out- at least in regards to the basic ideas.

2. Yes- alternative A.To me, Isle Royale is all about the wilderness of the island, this concept seems to address that the best

4. I believe that pictorial documentation of all buildings, etc., which represent Isle Royale's history is critical. This should be represented at a visitor center on the island but I don't feel it's necessary to keep the physical buildings, boats, etc.

Correspondence ID:

Received:

Project: Dec,03,2013 00:00:00

Project:

33691 Document:

**Correspondence Type:** Correspondence:

Letter

1. We don't like that alternatives are confining- more so than its current use. Each proposal seems to be directed toward special interests that would eventually discourage general interest.

2. Alternative B- our choice because it is most like the general use of it today. What we don't like is the potential of wasted dollars used to maintain life estate properties as they cycle out of private ownership.

3. We like the idea of printed program, self-guided tours for independent exploration and photography. Large group tours are alien to peaceful, quiet enjoyment that Isle Royale currently offers. For a detailed program, we'd be willing to pay.

4. Campgrounds, docks, maintained hiking trails (to include boardwalks when required), enhance the "Isle Royale" experience

5. Preserving a wilderness atmosphere is in our minds the island's #1 priority. This might mean breaking up large group dropoffs at wilderness sites.

**Correspondence ID:** 

Project:

33691 **Document:** 55915

Received: **Correspondence Type:** Correspondence:

Dec,03,2013 00:00:00

Letter

1. They seem to preserve wilderness and history well. I'm concerned about cost for Alt. B. But may be better spent elsewhere.

2. I think Alternative B, but not complete sold just yet. It seems the best though.

3. I wouldn't want any plan to increase visitor traffic that don't respect the park. Visitors are great and more are fine. But some

visitors can disrespect the wilderness if plans bring these type of disrespectful visitors, that's no good.

- 4. I definitely feel the Main Lodge in Crystal Cove should be preserved.
- 5. Thanks for the information and for reaching out to the public. Both are truly appreciated.

Correspondence ID: Received: Correspondence Type: Correspondence: 100 **Project:** 33691 **Document:** 55915 Dec,03,2013 00:00:00

Letter

- 1. I like the concepts of restoring/maintaining as many cultural aspects as possible by using partnerships. Alternative B.
- 2. Alternative B.
- 3. I feel that you should be more open in involving and using the traditional people of Isle Royale because they are the history of the park, they know the history the best to relate to the public, they are able to maintain the historic structures the best.
- 4. The sites in potential wilderness should be preserved. They are an integral part of the history and lifestyle of the time where a fishing family would just set up a home in the middle of the wilderness and in seclusion and survive. How many people would do that today? They survived in almost complete isolation from other people. It is important for the people of today to see and experience these out of the way sites so they can think and feel as our ancestors did.



I feel that our generation has a moral obligation to restore and preserve as many historic structures and cultural resources as possible on Isle Royale including maritime resources and archeological resources for future generations of children to learn from and experience.

The National Park Service has one last opportunity to save one of the most unique and historically accurate and intact cultural structures in the nation. The traditional people of Isle Royale have managed to preserve these structures and culture for the past 128 years. LETS NOT BE SHORT SIGHTED AND LOOSE THEM NOW!

Isle Royale is about 99.9% wilderness. Preserving structures in potential wilderness sites would in no way take away from the wilderness experience. It would be very easy to apply rules to these sites such as no modern conveniences, no generators, no antennas, no television dishes, no planes etc. and keep them very, very close to the wilderness designation and yet preserve historic structures in remote surroundings. Most of these structures are very, very small and hardly visible and do not take away from the wilderness designation.

The public has many, many acres of wilderness to explore outside of a handful of valuable historic sites in order to have a wilderness experience. These sites have been in the 'wilderness for 100 years or more and have not harmed the wilderness experience nor the wilderness. Most of these sites are not on the main land anyway. Most sites are only accessible by boat so they will not negatively impact the wilderness restrictions.

The NPS cannot preserve all of these historic structures on their own. Therefore, I would support Alternative B. The NPS should develop partnerships with willing participants to stabilize, restore and maintain these historic structures and artifacts into the future.

A good example of this type of partnership that has worked very well was started in 1996 by the Johns Hotel Historic Point Association which is a nonprofit 501c3 organization and the NPS. Since 1999, the historic Johns Hotel on Barnum Island and the Historic Johns camp building on Johns Island have been saved from complete deterioration. The NPS has invested its resources of labor and money into the Johns Hotel and the Johns Hotel Historic Point Ass. has invested their resources of money and labor over the years. Both entities working together have produced an example of a very successful partnership and preserved some of the most historic buildings on Isle Royale. The NPS, in the past, has used members of the Association to give presentations at the Windigo Ranger station to the public on the history of the Johns Hotel. Members of the Association have giving many tours of the historic buildings in Washington Harbor. The public really enjoyed the presentations and tours and were extremely interested in its history. \*Note: the Johns Hotel was a vacant building in 1996 and is presently uninhabitable while under restoration.

We need to duplicate this type of partnership in order to preserve the cultural resources on Isle Royale. Also, the Johns Hotel history includes a unique combination of a traditional people who were involved in mining, the tourist industry, the fishing industry and even homesteaded on Isle Royale starting in about 1865. Homesteading meant that a family had to occupy their land from early, early spring through December and grow crops and animals etc. on the land. It was a very, very difficult lifestyle.

Suggestions for the future: The Johns Hotel Historical Point Ass. Has access to many historic boats and artifacts that can be returned to Isle Royale and shared with the public in the future if a partnership can be continued with the NPS. These original artifacts could be added to and intertwined with the Johns Hotel history of traditional people on Isle Royale and be of great value for future generations to experience and enjoy.

Also, the Association would be in favor of reaching out to organizations such as Upward Bound, the Boy Scouts, a church

group, or college group in order to involve them in the future restoration and maintenance of structures in Washington Harbor and Johns Island. This expanded partnership would be a great asset for the park and the public. It could involve the public, especially students and young adults, in a wonderful experience on Isle Royale with little cost or work for the NPS.

The students could be involved with many aspects of the park. They can develop carpentry and building skills by safely working on historic buildings. They can learn the history of the buildings and research correct restoration processes of historic structures. They can do career exploration by spending a short period of time job shadowing with park personnel. They can fish, hike, camp and do some boating under supervision. The students would have to be age appropriate for each situation. For many of the students, it would be a first time experience in many of these activities. They could even sit around a campfire together and experience what previous generations of families thought and felt many years ago while living on Isle Royale.

All restoration, maintenance and activities would need NPS approval, but could be coordinated by the Johns Hotel Historical Point Association members and supervised by the volunteer organization personnel and a member of the Association. (Again, not a lot of work would be required by NPS employees). A member of the Johns Hotel Historical Point Association can handle all needed arrangements.

The Johns Hotel Historical Point Association would be interested in transitioning from VIP status to a more defined partnership to continue to restore and maintain historical structures on Isle Royale and preserve a small piece of history for future generations of Americans.

Correspondence ID: Received:

D:

101 **Project:** Dec,03,2013 00:00:00

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Document:

**Document:** 

55915 Private:

Y

Correspondence Type: Correspondence:

Letter

Letter

2. B- see below and like the historical education components and opportunities. Living history would be cool.

5. At this point all structures are part of the historical component at the park and should be saved as is practical compared to their worth and provide historical interpretation.

55915

Correspondence ID: Received:

102 **Project:** Dec,03,2013 14:24:53

Web Form

Correspondence Type: Correspondence:

Topic Question 1:

LIKE the general concept of increased efforts to inventory, document, and protect all historic cultural resources. Unfortunately, this is not clearly defined in any of the alternatives.

DISLIKE: Was difficult to determine if the concepts in the newsletter were largely part of a wilderness plan with a few cultural concepts included. The wilderness plan and the cultural plan should be two independent documents.

DISLIKE: Only one of the alternatives even suggests that a few historic sites might be prserved in wilderness/potential wilderness designated areas. As most of the remaining historic cultural resources (structures) are in such areas this would be a tragic loss to the cultural history of Isle Royale. It seems to indicate a view that wilderness and human cultural history are not compatable. As I remember the founding wilderness legislation indicated otherwise.

Tobins Harbor with essentially all areas designated wilderness/potential wilderness is a prime example of what would be culturally lost. At one time Tobins had 29 sites with structures, including 1 major resort, 3 fisheries, and 25 cottages. Sixteen (16) of those sites have already been destroyed, including a classic knotched log cabin built by an emigrant German carpenter and a unique 2 story log cottage. Only 13 sites remain and 8 sites, including the Artist-in-Residence cottage are occupied. Seven (7) of these are cottages reflecting how a group of individuals - some related, others friends - carved an active social network in a wilderness setting. The remaining occupied site is the Mattson Fishery that was established over 130 years ago, was a major fishery on the east end of Isle Royale, and represents one entire ethnographic group of Scandinavian fishermen and families. This group of nearly 100 inter-related SwedeFinns originally emigrated from the Swedish-speaking west coast of Finland. The loss of any of these remaining cottages or the fishery would be a blow to retaining the post 1880 human cultural history of Isle Royale.

# Topic Question 2:

Alternative B is the most positive in that it tends to include, treat, and preserve all cultural resources types equally. However, it still fails to acknowledge and preserve the many historic cultural resources in wilderness/potential wilderness areas.

Alternatives C and D each only consider one aspect of the thousands of years of human cultural history on Isle Royale and by themselves, would not constitute a CRMP for Isle Royale

# Topic Question 3:

As clearly stated in the online cover letter for this CRMP; "Isle Royale's cultural resources reflect 4500 years of human endeavor and include: prehistoric mining and occupation sites, American Indian and Euro-American historic mining and fishery sites, lighthouses, shipwrecks, and historic resorts and summer homes. They demonstrate a complex interaction of people and the role they played in shaping the human and physical landscapes on Isle Royale"

I fail to see how any of the alternatives plan to preserve and interpret all of the above human interactions with the nature and wilderness on Isle Royale.

Topic Question 4:

See comments in question #1

### Comments:

**Correspondence ID:** 

103 Project: 33691 Document: 55915

Received:

Dec,03,2013 00:00:00 Letter

**Correspondence Type:** Correspondence:

2. Alternative B

5. The entire breadth of cultural resource. Maritime to native to settlement (Euro)- needs representation. I am not against letting structures slide into natural decay/oblivion so long as sites are on inventory and accessible to archaeologists within or outside the agency.

**Correspondence ID:** Received:

104 Project: 33691 Document: 55915 Dec,03,2013 00:00:00

Correspondence Type:

Letter

Correspondence:

- 1. I am extremely happy that prehistoric work is finally being taken seriously at Isle Royale. Genuine archaeology of native use has been sorely overlooked at this park. I guarantee there is far more to find out in the landscape than is currently known. Please develop this aspect of the cultural story. Work with north shore tribes to tell this story, too!
- 2. No single plan is appropriate on its own. Assuming finding will always be a challenge for stabilizing and maintaining structures, a handful of those in good condition could be maintained and perhaps others moved to developed areas for interpretive programs. After all, most visitors would otherwise never see these old cabins, and in 50 years if they're all gone then at least a few remain to inspire visitors well into the future.
- 3. Instead of a zero-sum" concept, where one plan wins over the others, resources should be stratified by priority (high, medium, low). With less funding, maybe only high priority goals are pursued, greater funding allows more medium and low priorities to be pursued. This way, nothing is taken completely off the table, but the most important concepts and resources are taken up.
- 4. Useful sites for management activities should be considered for continued use, such as Amygdaloid Ranger station and Davidson Island. Bangsund could be given a special use permit until Rolf and Candy are no longer able to contribute to the wolf project. However, north shore rangers and structures could move to Belle Isle with a bigger structural footprint there, and Rolf could move to Davidson or contribute to park interpretation by being based out of Edison Fishery.
- 5. The life lease issue must be resolved once and finally. Stop making random, capricious exceptions and settle on a plan. However, do not stop listening to and including the families with such a rich history and love of the island!

Correspondence ID: Received: **Correspondence Type:** Correspondence:

105 Project: Dec,03,2013 00:00:00 Document:

55915

Letter

REF: Cultural Resources Management Plan - Isle Royale National Park

33691

many of these historic

sites have been lost, the ones that are remaining need attention and repair before it is too late. There is a huge benefit in restoring these sites for future visitors to see and appreciate. A great job was done with the restoration of Pete Edison's fishing site and the restoration of Rock Harbor Lighthouse see Crystal Cove, Milford and Myrtle's fishing site restored in this manner, so the cabins are useable and visitors can see and appreciate them. Time is ticking on this site, it can still be restored but with each passing year, the elements and insects work on it, it soon may be too late.

I would also like to see the restoration at the Captain Kid Island and Johnson Island sites. These are the few remaining sites on the isolated North side.

These sites are ideally located for boaters, canoes and kayakers to access and appreciate. They show the style and architecture of the times, they have withstood through the weather and elements and people would enjoy seeing them. Alternative B is the preferred concept. There is so much history and culture that could be preserved and appreciated. I feel people would find these sites very interesting to see how the island residents lived, the architecture of their buildings and the stories of their lives.

The north side of the island is very remote and isolated, I think for that reason the restoration of Crystal Cove, Captain Kidd Island and Johnson Island would be very beneficial to this section of the island, they are only accessible by water and should fall outside the wilderness areas.

1. I like the fact that the Park Service is considering making improvements to historical sites around the island. The plan of the Park Service looking into partnerships with groups to help preserve sites is a great idea. I do not like the No-Action Alternative reactive approach to the islands management. I feel the Park Service should take on a Pro-Active approach and take advantage of the historical sites that can still be restored, before it is too late to do so.

- 2. I like Alternative B; it states it would preserve the highest number of historical properties, including the full range of Isle Royale fishing, as well as pursue partnerships to assist in the preservation and reuse of structures.
- 3. No comment.
- 4. I think re-establishing a fishing site at Crystal Cove, as was done at the Edison fisheries, would be a valuable asset to the remote north side of the island. The fishing site is very historic and would be very interesting for anyone traveling by water to stop and enjoy. The buildings are still in good condition and could be restored if we do not wait too long. The cabins and structures at Captain Kidd are another very interesting location; the site is in good condition. Johnson Island site has already had quite a few improvements made and was at one time also a fishing site with much history. There are not many sites on the north side and it would be a shame not to preserve the few that are remaining.
- 5. No comment.

Correspondence ID: Received:

Project: 33691 **Document:** 106 Dec,03,2013 14:57:05

**Correspondence Type:** 

Web Form

Correspondence: Topic Question 1:

1. I see the need for a starting point and these concepts have been well thought out, but the final plan should not favor one group/resource over another.

55915

Topic Question 2:

2. No.

Topic Question 3:

3. Yes. It is costing the park nothing to maintain or preserve what the "VIP's" in Washington Harbor, in particular, have been doing. It appears you are looking for others to take over what we hold so dear. Let the people there stay. Visitors are so very interested in the buildings and what went on in the past.

Topic Question 5:

5. Do take into consideration the cost.



We thank the NPS for creating a national park. Had that not happened, things would probably look much different today.

55915

Correspondence ID: Received:

107 **Project:** 33691 **Document:** Dec,03,2013 00:00:00

**Correspondence Type:** 

Letter

Correspondence:

- 1. Alternatives C and D concern me. In my opinion, under either of these plans Isle Royale could turn into a circus. We already have plenty of "attractions" in our great country for people to see. There are times already, when motorboat traffic in Rock Harbor to Daisy Farm becomes too noisy and intrusive. Isle Royale is a unique and special place; Please preserve its uniqueness!
- 2. I prefer alternative A because it preserves Isle Royale in its most natural state. I visit the Isle for its peace and solitude. It is devoid of the "tourists" that you find at so many other national parks. I like that Isle Royale is primitive and you can only get around it on foot or by boat. I do not want to see it developed
- 5. If Isle Royale ceases to be the special and unique place that is is, I will not continue to visit it. I really appreciate the rangers at Isle Royale. They are professional, kind, informative, and committed to Leave No Trace ethics!

**Correspondence ID:** 

33691 55915 108 Project: **Document:** 

Received:

Dec,03,2013 16:47:35 Web Form

**Correspondence Type:** 

Topic Question 1:

Correspondence:

1) The draft appears to make an attempt to cover a variety of interests regarding Isle Royale. However, individual interests can have a very limited scope for future planning.

Topic Question 2:

2) Yes, I prefer alternative concept 'B' since this one seems to encompass a variety of interests regarding Isle Royale and a fuller range of significant historical happenings on and around the island. It would satisfy the public as well as the inhabitants who still have an investment in their family history and culture on the island. The Park can plan a more prosperous future with the variety of cultural resources accessible through concept 'B'

3) One thing that is in great error is to designate any part of Isle Royale a wilderness that actually had human inhabitants over the last century and a half. That would be deceptive and wrong. No area is a true wilderness that has been touched by human involvement. Please take a more serious second look at this erroneous action.

4) Î definitely want to see the Johns Hotel restored as much as possible and become a future attraction for travelers/vacationers who do not camp, fish or hike but would like to come to the Island and have an historical structure to tour and learn from. Also, the small log house near the Hotel may even be older and has purpose for future use- -that too needs to be preserved along with the Hotel. There is much invested in the Hotel already and is a great authentic resource reflecting a vital part of human history at Isle Royale. (See more under comments)

5) I would like to share much more about the possibilities for the Johns Hotel but will keep it brief at this point and may be able to expand on it within the next year or during the next planning stage. SEE COMMENTS THAT FOLLOW.

Comments: I have traveled across our beautiful country and within our National Parks. What draws people to many of the historical settings is to be able to visit a place where our ancestors lived and conducted their daily lives. Visitors love to see how people lived in the past. This can be done on the Island at the Hotel. The Johns Family has personal furnishings that can bring the Hotel back to it's 'flourishing' years where families lived, worked, played, and cherished all that Isle Royale had to offer. There also exists personal documents, letters of correspondence, and many pictures that could be displayed for public viewing as visitors stroll through the log Hotel to learn about the past history and human connection to this National Park. Here are some of the plans that a solid and well thought out partnership can offer:

- 1. A dock at Barnum Island at the shore of the Hotel near a replicated Boat House with fish nets and vernacular boats.
- 2. A Park boat that brings a limited number of persons (who overnight in the Windigo cabins) to Barnum Island to first view the Hotel and it's historical contents via a docent tour(volunteer docents by partnerships stay in the small log house), then take a short hike on the island path to walk around and view other structures from the outside, then return to the hotel area to enjoy some Lake Superior fish appetizers and refreshments--then return to Windigo. A charge for the tour or donations can be considered. Docents may be original family members for a week at a time during open season but also an affiliation with a college such as Ashland's Northland

College outdoor degree program. This type of visitor's guided tour can involve up to 3-4 hours and offer those visitors a very worthwhile trip across the lake. More can be discussed but this is a start at developing the plans and vibrant partnerships the park wants to see that will carry Isle Royale through the next century while preserving as many cultural resources as possible.

55915

**Document:** 

Correspondence ID: Received: Correspondence Type:

Correspondence:

**Project:** 109

33691

Dec.03.2013 19:24:52

Web Form

Topic Question 1:

The alternatives are honestly conveyed in a manner that clearly indicates what resources will be preferred over others under the alternatives. Of concern is the strange mix of alternatives that include focus on singular themes- in particular Alternatives C and D, which stress maritime activities and archaeology. Although those themes are likely of interest to the general public, there is little transparency in how the alternatives were initially arrived at, thus their presentation comes a little out of nowhere. Those with special interest in specific themes, as well as those with access to committee decisions must have great influence on the development of these alternatives and functionally, the ultimate decision. Open forums such as these are important, but caution should be taken when reviewing the comments. Are comments from a diverse, representative group of Isle Royale visitors, or simply a small sector of people with specialized interests or power? The strange focus on particular themes would suggest the latter is occurring. How are these meetings advertised, and are enough people from varied interests actually involved in the decisions that will influence their experience?

# Topic Ouestion 2:

I prefer Alternative B because it is the most fair to all the varied interests of visitors that visit the park, including the many that may have missed this open forum call. I understand that this alternative requires the most resources, but at the same time it also provides the most opportunity for the park to build bridges to interested non-profit institutions such as universities, NGOs, etc. that will ultimately create a more enriching experience for park staff, outside collaborators and visitors to the park.

The maintenance of cultural resources is only as good as the educational outreach programs created to connect those cultural resources to the visitors of the park. Although all the alternatives mention education in some small way, education should be stressed further, and could be on its own, a valuable and robust Alternative. There needs to be strong links between educators and cultural preservation teams to best utilize these resources. Partnerships with universities, families that have a strong historical knowledge of the resources, etc. is not only cost-effective but also provides accurate historical documentation, continued preservation of resources by interested parties that are likely to pay special attention to detail, and most importantly, education to visitors and scholars.

# Topic Question 4:

I think all resources should be preserved because they are each in their own equal way a part of the history of the island. Picking which cultural resources are winners and losers is inherently biased, and should be avoided.

## Topic Question 5:

I hope that you will consider an alternative that stresses cooperation between members of the community interested in the park and all of the varied cultural resources, with special attention to education programs that will increase public access, learning, and enjoyment of the cultural resources available at the park.

Comments: Isle Royale is a hidden jewel, that few members of the public, in particular, minorities, have access to enjoy. Many of these cultural relics, reflect a history of the island ranging from Native Americans to coal miners to rich white settlers. Where that history ends, the future continues as we still tend to focus on the history and preservation of relics from the recent past. One question I have is whether there are any living relatives of the Native American that were likely driven out from these areas, do they have access to the park and its resources, and has there been action on the planning committee's part to actively seek out these people and request their comment? If people are removed from their history for too long, that history tends to disappear.

I would like to stress that if the goal of this management plan is to preserve cultural resources, we need to first preserve links to the makers of the culture. Second, we need to create new links and future cultural resources by extending opportunities of "wildnerness" to minorities and those coming from disadvantaged backgrounds who may never even know Isle Royale exists if no one cares enough to show them.

55915

Correspondence ID: Received:

110 **Project:**Dec,03,2013 21:17:41
Web Form
Topic Question 1:

Received: Correspondence Type: Correspondence:

The draft alternative concepts seem very narrow in focus. I feel there is opportunity to combine aspects of all of them to create a well rounded park that is representative to both the natural and cultural history of the island.

## Topic Question 2:

33691

**Document:** 

Alternative B makes the most sense as a way of preserving both the cultural and natural history of the island. Isle Royale is a beautiful example of wilderness and this needs to be preserved. However it is also part of the human history of Lake Superior through fishing, mining, recreation, etc.

Historical buildings on the island can be preserved with minimal impact on the environment. Allowing such buildings to deteriorate is disrespectful to the cultural history of the island.

Preserving both the natural beauty and the human history of the island through partnerships would allow for various groups to become a connected to the island in a very unique way. This could also be a way to increase the number of visitors to the island by providing a wider range of activities to experience. Isle Royale is a park in the unique position to offer the visitor a complete wilderness experience, a step back in history or both.

## Topic Question 4:

In general the historical buildings such as fishermen's homes, boat houses, the Johns Hotel, etc. should be preserved. They provide the modern park visitor with an opportunity to better understand a lifestyle that required the utmost respect and understanding of nature in a remote wilderness.

And certainly the ranger stations and park buildings should be preserved in order to facilitate managing the park.

## Topic Question 5:

In creating the NPS, the bill President Woodrow Wilson signed called for the NPS to "to conserve the scenery and the natural and historic objects and wildlife therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." With alternative B and the preservation of both the natural and historic objects, Isle Royale will continue to fulfill this mission for all future generations.

## Comments:

Correspondence ID: Received: Correspondence Type: Correspondence: 111 **Project:** 33691 **Document:** 55915

Dec,04,2013 08:29:53 Web Form

Topic Question 1:

I strongly feel that first, you have insufficient baseline data to even begin the process of developing alternatives because you did not do a full ethnographic analysis of the community and cultural resources on Isle Royale, as required by NPS policy, Director's Order 28. I also believe there should be broad resource preservation, not favoring one resource over another. And, finally, NPS should approach Congress to remove Wilderness designation from areas where cultural resources are located and then proceed with the management of those resources.

Topic Question 2:

See comments to question 1.

Topic Question 3:

See comments to question 1.

Topic Question 4:

See comments to question 1.

Topic Question 5:

The draft Foundation Statement must be revised to include reference to "Historical" components of IRNP in the Significance statements and Fundamental Resource statements. There is reference to Wilderness, there is no reference to Cultural Resources. The Wilderness Act and the National Historic Preservation Act need to provide tandem guidance, with neither trumping the other when NPS discusses wilderness and cultural resource issues.

Comments: I strongly feel the NPS has no interest in preserving these resources or the community on isle Royale. The fact that these alternatives were drafted with no input from Consulting Parties, no Ethnographic analysis, and no mention of cultural resources in the draft foundation statement indicates a complete disregard for preservation. I am deeply concerned with this process and feel creating a manufactured wilderness by not preserving all of the resources on Isle Royale will rob future generations of the unique human history on isle Royale and create a false sense of human activity in Isle Royale's natural environment.

Correspondence ID: Received:

Project: 112 33691 Document: 55915

Correspondence Type:

Dec,04,2013 12:00:16 Web Form

Correspondence:

Topic Question 1:

LIKE: I like the option to preserve the fewest number of historic properties and cultural resource types. Funding through traditional NPS means is OK, and so is some partnerships with others. I like the plan not to emphasize one historic theme or time over another. I like the reliance on extensive interpretation as the means by which visitors understand the fundamental link between humans and natural resources

DISLIKE: I do not like the NPS being in a reactive role relating to the preservation of historic properties. I do not think there is a need to preserve "ALL" the historic properties or cultural resource types. One or two from each historic properties or cultural resource types is fine. I dislike the Alternatives that specialize too much in one theme and ignore or minimize the other themes. I do not like the ideas of demonstration fisheries, craft field schools, venue for university field schools, etc.. Keep this type of activity on the mainland. Plans to preserve the lighthouses are a waste of time and money.

Topic Question 2:

I prefer Alternative A, as it contains most of the items I said I liked in Question 1.

I would add the following items to Alternative A. I would include partnerships with private or nonprofit partners to achieve preservation goals in addition to traditional NPS funding mechanisms. I would not emphasize one historic theme or time over another

Comments:

Correspondence ID:

Project: 33691 55915 113 Document:

Received: Correspondence Type: Dec,04,2013 12:21:53 Web Form

Correspondence:

I have a few quick comments that I would like to make:

(1) The NPS has not performed an ethnography on the people that make up the historic Isle Royale community and culture. This is specifically required (before starting the planning process) as outlined by Director's Order NPS-28.

not understand how a group of NPS employees can blatantly ignore an NPS policy that is designed to ensure that the NPS obeys the law (the Historic Preservation Act). If this plan moves forward without an ethnography, the group is clearly not following policy and likely not following the law. Furthermore such a course of action is pre-decisional. If the current course of action is followed, the NPS has effectively already made the decision that nothing that could possibly be learned in an ethnography is important and no aspect of the culture is worthy of preservation....clearly pre-decisional. My advice: follow policy, follow the law, do an ethnography first, then work on your plan.

- (2) Most of the alternatives make no sense to me, as they propose to preserve a single aspect of Isle Royale's rich cultural heritage to the exclusion of all else. Why, for example, would anyone propose to only focus on those aspects of culture and history that happen to be accessible through archaeology? My advice: Preserve the full range of what remains of Isle Royale's rich cultural heritage.
- (3) The boundary between potential wilderness and non-wilderness is at the shoreline adjacent to a number of camps that are now deemed historic (but were not at the time the boundary was drawn). Now that the camps are deemed historic, it would make sense to appeal to Congress to shift the boundary 100 feet or so that the historic camps can receive the full protection afforded by the Historic Preservation Act.

**Correspondence ID:** Received: Correspondence Type: Correspondence:

33691 55915 114 Project: Document:

Dec,04,2013 13:00:59

Web Form

Isle Royale itself is a cultural artifact with interlinking, interconnecting parts as described by Dr. Phil Scarpino in his 2010 historic context study. I would therefore, support an alternative to the CRMP plan that views the island holistically and honors the island as a historical wilderness whereby there is a recognition that all cultural resources have relationships to each other, including the preservation of Isle Royales historic structures and landscapes, material culture and historic objects, human history, cultural traditions, ethnographic practices, historic communities and historic use.

I am most concerned with the preservation of Isle Royales historic seasonal fishing and wilderness camps that date back to the

late 19th and early 20th century. Their history and ethnographic traditions are largely undocumented and sometimes misunderstood; their preservation remains in a fragile state as those who lovingly built and cared for them lose long-term permits and leases. The historic significance of these camps is linked to late 19th century immigration patterns, reactions against urban industrialization and the rise of a wilderness ethic that brought the middle class to Isle Royale and forever linked them side by side with working-class fisher folk. A shared conservation ethic amongst these islanders is also reflected in the built environment where chimneys are made of hand-carried Lake Superior stones, kitchen floors are patched with tin cans, and roofing eaves are made of shipping crates. This vernacular style of building, maintaining and preserving the resource is unique to Isle Royale in part because of its remote island location and in part because of the care and resourcefulness of its inhabitants who made do. As Royce Yeater, preservation consultant and panelist at the National Trust for Historic Preservation conference (2012) noted: Every log, every piece of flooring, every window sash with a view seems to evoke a story. Preservation on these island camps is more than patching a rotting board; it is the inter-relationship between culture and preservation, people and place. Without its historic use, these cabins, camps and cultural landscapes remain empty shells and face an uncertain future in a park where burning of the resource, removal, moldering and finally ruin has become an acceptable management practice for decades. As Dr. Scarpino noted: Buildings abandoned and standing empty or used out of context may be saved, but they are not preserved.

Yeater also argued for the links between community and preservation: I would argue that the sense of community and the tiny culture the families have created deserves to be protected as an ethnographic resource. Because additionally the families add other value to the Park - in their stewardship of fragile resources, the volunteer work they do to enrich the experience of park visitors, and the knowledge of local history they represent - I conclude that every effort should be made to keep them connected with their traditional properties. We all know the best way to preserve a building is to use it, and who better to do that then those to whom it has the most significance.

Brian Conway, Michigans State Historic Preservation Officer echoed this theme when he wrote to the NPS on December 9, 2010: The best stewards of the historic structures on the island will be those with familial and emotional attachments to the resources. Time has proven this to be true, as most of the historic structures that retain the highest integrity today are those associated caretakers with ancestral ties to the island.

This is the American publics history and it deserves to be preserved.

The best way to do this would be to remove the potential wilderness designation from those areas in the park containing cultural resources that qualify for listing on the National Register (0.06%). I support an alternative that would have the NPS work together with its stakeholders and consulting parties to achieve this goal through Congressional legislation. Then, I support a creative, innovative plan to preserve these cultural resources through public/private partnerships as described in Alternative B. The Isle Royale Families and Friends Association would be a mutually beneficial cost-effective non-profit partner is such an endeavor with over 100 years of experience building, maintaining and preserving the historic seasonal camps.

This plan to remove a small amount of cultural resources from potential wilderness status would also allow for the greatest amount and greatest variety of cultural resources to be preserved on Isle Royale.

I also suggest that the model at Cape Cod National Seashore be followed whereby cultural resources such as the dune shacks are preserved through a combination of short term, medium term, long-term and hybrid arrangements, honoring the ancestral kinship ties associated with the park (including the intangible values associated with solitude, spirituality, privacy) while allowing for hybrid uses of the resource in various arrangements by members of the public.

In addition, I ask that an independent, comprehensive ethnographic study be conducted on the historic wilderness camps and their cultural activities and communities, following NPS 28 mandates, including field studies and interviews on the island to better inform preservation of cultural resources. I also ask that a review of the TAP analysis be conducted in order to correct factual errors and re-evaluate the significance of Isle Royales historic people, families and communities.

I agree with the National Trust for Historic Preservation that the historical intent has been left out of the NPS Foundation Statement and should be incorporated to preserve and protect all historical resources including the historic structures, cultural landscapes and associated cultural practices, traditions and communities.

I support the Isle Royale Families and Friends Association Cultural Resource Management Plan Options submitted to the NPS in June 2012 and also support IRFFAs submission to this open comment period in December, 2013.

Correspondence ID: 115 Project: 33691 Document: 55915

Received: Dec,04,2013 13:06:49
Correspondence Type: Web Form
Topic Question 1:

Like: that IRNP is serious about Cultural Resources Management and thinking about the ways in which CRM and Wilderness planning will determine the future character of the park.

Like: the creative thinking about developing cultural resources and developing meaningful relationships with other institutions,

from universities doing advanced fieldwork-based research (e.g., ethnography, archaeology) to traditional "craft" instruction. This list could be expanded to historic preservation, history, social history, and so on in addition to more scientific fields (fisheries management, biology, botany) that will be so critical for our understanding of climate change.

However, these new partnerships should not be profit-driven endeavors. I keep thinking of the long-term Wolf-Moose study as something that has literally put IRNP on the map for so many people, and not only scientists but students of all ages in North America. Whenever I mention IRNP in Canada, if people have heard of it, it's either because of that study or because they're from the North Shore.

Don't like: limited conceptualization of "culture" and "ethnography"; it appears that the authors think of culture and ethnography as appropriate when dealing with distant or long-gone cultures (e.g., aboriginal settlement, lighthouses, mines) rather than the variety of ones that have shaped the island and continue to be present there, such as boaters and cottagers. These groups engaged in "primitive recreation" (Alternative B) have helped shape the park's special character to a large extent and seem side-lined or marginalized here. All of the groups that have contributed to the island's culture merit consideration here.

It also seems like there is a disjuncture between what the Park is thinking about in terms of Cultural Resource Management and other government-sponsored approaches to historic preservation. How much cooperation has there been between historic preservation groups on the state and national levels?

Don't like: the overriding impression I get that Wilderness and Cultural Resources are at odds with one another, or at least being worked on separately. Neither exists in a vacuum; they have a symbiotic relationship. Thus this premise of two separate studies seems very artificial.

### Topic Question 2:

No; the ideal one in my view would appropriate aspects of Alternatives A-D. The No-Action Alternative is not viable, in my mind, given the myriad challenges facing the NPS in general and IRNP in particular.

### Topic Ouestion 4:

In Alternative B, the "rehabilitation and adaptive/compatible reuse of structures with partners" suggests an interest in shoring up some of the cabins and, presumably, repurposing them. Many of them are 100 years old or more and increasingly rare speciments of the architecture of "primitive recreation" on the Great Lakes. The cabins and the people who have used them for generations are full of timely lessons about how to live simply and without the amenities of modern life. It would be nice if those ideas and people could have a role in defining what these structures should become.

### Comments:

Correspondence ID: Received:

116 **Project:** 33691 **Document:** 55915

**Ped:** Dec,04,2013 14:08:42

Correspondence Type: Web Form

Correspondence: Topic Question 1:

The all-encompassing approach which includes incorporating elements of Pre-Contact, Proto Contact, and historic era themes is what I see as positive aspects of this CRMP. This includes communication with both Native American and Euro-American descendant communities.

I also like the individual focuses on the roles of copper resource extraction and fish and other natural resource exploitation through time.

## Topic Question 2:

I am not in favor of the 'No-Action Alternative.' I am in favor of Alternative D, the archaeological emphasis. Although I also feel the need to try to achieve a balance of historic preservation from all of the historic themes, with focus on the more prevalent historic themes through time.

I like many parts of Alternative C. To me it seems to incorporate an emphasis on the ecological history and human interaction with the island and the surrounding waters. It also tries to connect the present to the past.

Although I think that elements from each historic theme should be preserved there are certain historic themes that should be given special emphasis. One such theme is copper extraction, both in Pre-Contact time by Native Americans and in historic time be Euro-Americans. The other main theme is the ecology and human interaction with it.

Essentially, not all historic themes or components should be preserved equally. More recent historic themes, such as cabins and resorts, are often more prevalent on the landscape than earlier historic themes. Historic lumbering appears to have been brief in the history of Isle Royale and did not play as important of a role when compared to others.

In summary, the archaeology is key, but is not likely to be adversely impacted by benign neglect. The historic structures, particularly those standing wood structures, should be prioritized for preservation based on their collective role in the history of the island.

# Topic Question 3:

If possible, it would be ideal to keep some of the intact historic structures, such as resorts, cabins, and potentially lighthouses to rent out to visitors. These would likely have to be government owned properties outside the designated Wilderness boundary. The revenue generated from renting these historic, unique, and isolated properties could, if planned and administered properly, be enough to fund the perpetual preservation of these structures and possibly additional structures. Obviously, this is easier written than accomplished, but it could equate to the preservation of numerous more historic structures than not. Furthermore, by removing the preservation burden of these structures from the cultural resources budget, it frees up money and other resources for use in other areas.

# Topic Question 4:

As stated previously, I think a few examples of each theme should be preserved, as resources permit. Certain themes played larger and longer roles in the history of Isle Royale and should be weighted more in prioritization. The most important to me are copper mining, fishing, and habitation sites.

# Topic Question 5:

I think the continuation and expansion of volunteer groups, partnerships, and Tribal programs, including oral histories are a key to the continued story of Isle Royale. Furthermore, preservation, interpretation, and education should be the main focus of cultural resources management.

Comments:

**Correspondence ID:** Received:

117 Project: Document: 55915

Correspondence Type:

Dec,04,2013 14:20:56 Web Form

Correspondence:

Topic Question 2:

Alternative B is the option I prefer because it purportedly "does not emphasize one historic theme or time period over another and preserves the highest number of historic properties." This option therefore offers something of interest to more people, which is generally a positive thing. Though I suspect that Alternative B comes with a higher cost, the breadth of appeal should

I trust that Alternative B does not require preservation of every remaining inholder structure, which seems unnecessary to me. A representative sample of such structures in locations where they can be seen by visitors is sufficient in my estimation.

# Topic Question 5:

Personally, I have found that coming upon an historic feature while in a wilderness area is a bonus rather than a distraction from the wilderness experience. I have also encountered archaelogists at work (Merritt Lane campsite) and have enjoyed the opportunity to watch and discuss their efforts with them. I do not think you need to shield visitors from such things to maintain the wilderness values that are paramount.

Finally, consideration should be given to combining the light house keeper re-enactor and lightkeeper-in-residence concepts from Alternative C with Alternative B. Allowing visitors to spend a night in a lighthouse could also be considered. These concepts would provide yet another way for visitors to experience IRNP while having little negative impact on the wilderness and those seeking to experience the wilderness.

Comments: Thank you for the opportunity to comment. Our nation's national parks are marvelous and Isle Royale National Park is amongst the very best of the parks.

Please put me on the mailing list for correspondence regarding the Isle Royale Cultural Resources Management Plan and the Wilderness and Backcountry Management Plan.

Correspondence ID: Received: Correspondence Type: Correspondence:

Project: 33691 **Document:** 55915 118

Dec,04,2013 14:40:20

Web Form

Topic Question 1:

Question 1: I strongly favor Alternative B as its comprehensive nature is the most conservative in preserving cultural resources of potential value. I think it is shortsighted to dramatically favor one category of cultural resource over others. Alternatives C and D implicitly devalue other cultural resources and therefore represent very narrow interpretations of what is of value. Do these alternative accurately reflect the public's view of what is culturally valuable? Alternative D is notably the weakest and strangest alternative. In particular, Alternative D muddles the boundaries between preservation and research. Any serious archeological research will likely require funding beyond limited park resources (for example, in the form of grants obtained by researchers, university affiliated or otherwise). It seems both beyond the mission of the CRMP and extremely biased to invest deeply in "a significant increase in archeological inventory" at the expense of not maintaining other potentially valuable and likely more fragile cultural resources. I would like to stress that I think archeological research is certainly of great value. However, when working with a limited pool of resources to serve preservation of a diverse set of cultural resources it would be biased to fund research on durable archeological resources, resources that could likely be preserved at minimal or no expense, at the cost of losing other more fragile resources.

# Topic Question 2:

Question 2: I strongly favor Alternative B. This concept is the most comprehensive, and does not exclusively focus on one narrow interpretation of value at the expense of others. Again, a special focus on either maritime resources or archeology seems both biased and shortsighted. Why are these particular categories highlighted over others? Alternative B has the potential to preserve the diverse cultural resources of the park and therefore benefit the most members of the public.

# Topic Ouestion 3:

Question 3: Both in the CRMP newsletter and in the oral presentation to the public there was no mention of the relationship between people and cultural resources. In particular, the idea that communities with a history at Isle Royale may themselves be an important cultural resource was absent from the discussion. Families that have been going to Isle Royale for generations have a unique knowledge of the local history as well as the local natural history. Preserving objects such as maritime structures and summer cottages is an important step. But what is lost by merely maintaining a set of structures? If the aim is to preserve culture, then I believe a richer alternative is to also maintain ties to the people associated with these structures. One way to do this would be to involve people with links to structures with maintenance of those structures as well as outreach to members of the public. This approach would be both a richer and more economical alternative than those proposed in this draft.

### Topic Question 4:

Question 4: I believe that at this stage we should make an effort to maintain as many resources as possible. It is a difficult task to assign value to one set of resources over another, and strong favoritism for one category of cultural resource at the expense of others is a dangerous approach. Once we make the decision to not preserve a resource it may easily be lost with no opportunity to recover it.

### Topic Question 5:

Question 5: I would discourage favoring maritime or archeological resources at the expense of others. Also, I would like to see an alternative that considers the importance of communities with a history at Isle Royale. The knowledge that these communities hold is unique, and preserving ties to these communities would add a dimension to the cultural resources of the park that none of the current draft alternatives provide.

55915

#### Comments:

Correspondence ID: Received:

Project: 119 Dec,04,2013 00:00:00

33691

**Document:** 

**Correspondence Type:** Correspondence:

Web Form Topic Question 1: Concepts seem fine.

Topic Question 2:

Alternative 'D' is appropriate.

I think that the prehistory of the Island and of the Keweenaw are of primary importance. The possibility of finding habitation evidence of the Ancient Copper miners would help define the past of this area. As the Industial use of copper here is amoung the earliest uses of metal in the world I think this aspect of Isle Royale is unique. Isle Royale hasn't been worked over as has the mainland, in regards to metal detectors, there for this is likely the best chance of locating ancient sites that are intact. I would very much support more on the ground archeological investigations including surveys of ancient shoreline areas and formal digs at ancient sites.

### Comments:

**Correspondence ID:** Received:

120 **Project:** Dec,04,2013 00:00:00 Document: 55915

Correspondence Type: Correspondence:

Web Form

Topic Question 2:

On behalf of our members and supporters, NPCA supports the implementation of Alternative B as it is most consistent with the purposes of the park and emphasizes its full history. We discuss the relevant authorities and each alternative more fully in the general comments section.

Comments: December 4, 2013

National Park Service

Attention: Brenda Todd, ISRO CRMP Project Manager

33691

Denver Service Center, Planning Division

PO Box 25287

Denver, CO 80225-0287

Re: ISRO Cultural Resources Management Plan - Comments on Alternatives

Dear Ms. Todd:

On behalf of the National Parks Conservation Association (NPCA), we thank you for the opportunity to provide you with comments on the Isle Royale National Park Cultural Resources Management Plan (CRMP) draft alternative concepts.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working together with our more than 800,000 members and supporters nationwide to preserve our nations natural, cultural and historic heritage for future generations. NPCA has a longstanding interest in protecting our national parks and their cultural resources, and we are particularly interested in the CRMP and its potential to improve the management, treatment and interpretation of the parks cultural resources.

On behalf of our members and supporters, NPCA supports the implementation of Alternative B as it is most consistent with the purposes of the park and emphasizes its full history. We discuss the relevant authorities and each alternative more fully below.

Relevant Laws and Plans

Isle Royale National Park is a unique blend of pristine wilderness with a history of human activity. For this reason, the parks purpose was defined to preserve and protect the park's wilderness character while also preserving and protecting the park's cultural and natural resources. The park also provides opportunities for scientific study of ecosystems and human influences in order to educate the public. General Management Plan (GMP) at 13 (1998).

In 1976, 131,880 acres plus 231 potential acres were designated as wilderness (99% othe land base), thus subjecting the Park to

the provisions of the Wilderness Act. October 20, 1976, PL 94-567. Under the Wilderness Act, the National Park Service is responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character. 16 U.S.C. Section 1133 (b).

The 231 acres (potential wilderness) are to convert to wilderness once nonconforming uses are removed or lessened. GMP at 109-10. In fact, this is the congressional intent behind designating an area as potential wilderness. The House Report accompanying the Wilderness Act (HR 13160) indicated:

"National Park Service wilderness proposals have embodied the concept of 'potential wilderness addition' as a category of lands which are essentially of wilderness character, but retain sufficient non-conforming structure, activities, uses, or private rights so as to preclude immediate wilderness classification. It is intended that such lands will automatically be designated as wilderness&when the non-conforming structures, activities, uses, or private rights are terminated."

In 1983, 138 acres of potential wilderness were converted to designated wilderness. Currently, there are 93 acres that remain as potential wilderness with temporary nonconforming uses, including former commercial fishing sites, summer cabins under life leases, and locations that support National Park Service functions. Final Wilderness and Backcountry Management Plan and Environmental Impact Statement (2011), Table 1 at 25, 35.

Laws intended to preserve cultural resources are still applicable in wilderness, including the National Historic Preservation Act, as protection of cultural resources are a critical facet of wilderness management. Id. at 33.

### General Comments on Alternatives

We support and encourage the park to incorporate in the final CRMP the following proposed actions common to all of the alternatives:

- "Increasing efforts to inventory, document, and protect ethnographic resources by consulting associated tribes and others;
- " Inventorying cultural and archeological sites and landscapes; and
- " Allowing life leases and special use permits for private residences to expire.

These actions will ensure that all of the cultural resources at the park are identified and inventoried and that the full range of human history can be interpreted by the National Park Service for visitors, including that of native peoples who played an important role in the human history of Isle Royale for thousands of years. Allowing life leases and special use permits to expire fulfills the parks legal obligations. It also furthers the purposes for which the park was designated, allowing these areas to convert to wilderness as Congress intended. Any cultural assets identified in these areas will be subjected to the pertinent laws and policies governing cultural resources, thus the unique histories of these areas can still be preserved or interpreted for future generations.

### Alternative A

Alternative A maintains a minimal level of resources by relying heavily on interpretation and allowing the deterioration or removal of most historic structures and sites in designated wilderness areas. Outside designated wilderness, only a limited number of resources would be stabilized.

This alternative would mean sacrificing the parks human history. Although the park is 99% dignated-wilderness, every place bears witness to the handprint of human history, and Isle Royale National Park is no different. Human activities have shaped the landscape of the park, but this alternative does not allow for any of this history to be preserved. Therefore, we do not support Alternative A as it focuses solely on preserving wilderness at the expense of the rich history and cultural assets at the park.

# Alternative B (Best Alternative)

NPCA supports the implementation of Alternative B because it preserves a variety of historic properties that represents the full range of the 4,500 years of history and human activities on Isle Royale while still upholding the wilderness character of the park. This alternative does not discriminate against any elements of the parks history and preserves the highest number of historic properties outside wilderness areas. In designated wilderness areas, resources that contribute to scenic qualities, solitude and primitive recreation and wilderness character will be preserved. This alternative improves the visitor experience by expanding education of the layered human experience in a wilderness environment.

Under this alternative, the National Park Service acknowledges that it will need to pursue partnerships in order to stabilize and preserve the cultural assets. In this current fiscal climate, these partnerships will be critical as the parks future funding is uncertain and the park does not have a strong philanthropic partner. Life-lease families have already made contributions in terms of preserving cultural assets at the park, and as the park meets its legal obligations under their life leases, it will be important for the park to continue to work closely with these families to ensure that their unique history and stories are well preserved and/or interpreted for future generations.

Alternative B also supports the parks designation by UNESCO as an International Biosphere Reserve. This is a designation given to protected areas that are considered as sites of excellence where new and optimal practices to manage nature and human activities are tested and demonstrated. http://www.unesco.org/new/en/natural-sciences/environment/ecological-sciences/biosphere-reserves/

Alternative B supports this designation through management that creates a balanced relationship between humans and the biosphere.

Finally, in 2007, NPCA completed a State of the Parks study of Isle Royale National Park. At the time, the state of the cultural resources in the park were rated as critical given [i]mportant research and preservation projects are unfunded, cultural resources are not fully interpreted, and the park has just one cultural resources staff member who must also manage interpretive programs. Id. at 45.

Alternative B carries out many of the recommendations from this report, including the identification and interpretation of ethnographic resources, preparation of historic structures and cultural landscape reports, and undertaking archaeological surveys. Id.

#### Alternative C

Alternative C emphasizes maritime resources at the expense of all other types of cultural resources, thus presenting an incomplete representation of the islands true history. Therefore, we do not support Alternative C.

#### Alternative D

Alternative D emphasizes archaeological history at the expense of all other types of cultural resources, thus presenting an incomplete representation of the islands true history. Therefore, we do not support Alternative D.

NPCA supports the implementation of Alternative B in the final cultural resources management plan for the park as it preserves a variety of resources representing the entire scope of the human history at Isle Royale without jeopardizing the parks

We look forward to reviewing the full cultural resources management plan in the future and thank you for the opportunity to submit comments on the draft alternative concepts.

Correspondence ID:

**Project:** 

**Document:** 

55915

Received: Correspondence Type: Correspondence:

Dec,04,2013 15:38:33

Web Form Topic Question 1:

Please see General Comments section.

33691

Topic Question 2:

Please see General Comments section.

Topic Question 3:

Please see General Comments section.

Topic Ouestion 4:

Please see General Comments section.

Topic Question 5:

Please see General Comments section.

Comments: December 4, 2013

National Park Service

Attn: Brenda Todd, ISRO CRMP Project Manager Denver Service Center, Planning Division

PO Box 25287

Denver, CO 80225-0287

The Apostle Islands Historic Preservation Conservancy (AIHPC) submits these comments on the preliminary alternative concepts and Draft Foundation Document for the Cultural Resources Management Plan for the Isle Royale National Park (CRMP). We incorporate by reference the comments set forth in our previous letters of January 14, 2011, and August 2, 2013.

The AIHPC commends the National Park Service (NPS) for the detailed attention it is providing to cultural resource management planning at the Isle Royale National Park (IRNP or Park). The Park is an extraordinary resource of national and international significance. IRNP is indeed one of the crown jewels of the National Park System. There are many distinguishing features that elevate IRNP to this status. One the preeminent characteristics that makes IRNP so special are the extensive historic and cultural resources found throughout the archipelago. The CRMP is essential to ensuring the long term preservation and interpretation of those resources, and we are grateful for the opportunity to submit these comments.

The AIHPC is a community-based nonprofit organization dedicated to the broad mission of promoting the preservation, enhancement and appreciation of the historic and cultural resources of the Apostle Islands region of northern Wisconsin. Our mission encompasses, but is also much broader than, the historically significant resources of the Apostle Islands. Throughout the Lake Superior region, important cultural and historic properties are at great risk, and the preservation of such locations and their links to human and natural history should be top priorities for all governmental agencies working in partnership with other entities. Undertaking cooperative ventures of this nature is nowhere more important than within the national parks of Lake Superior, where the largest assemblage of such resources is found but where diminishing budgets and staff resources place these structures and landscapes are great risk. IRNP has an opportunity to forge new ground within the National Park System by embarking on a CRMP that will ensure maximum protection of the Park's historic heritage and doing so through innovative, cooperative and cost-effective management tools that reach beyond the NPS and enlist the aid of the many individuals, families, organizations, businesses, and agencies who share an appreciation for, and love of, Isle Royale.

As discussed in more detail in these comments, the historic and cultural resource mandate set forth in the National Park Service

Organic Act and reflected in previous IRNP management documents is not adequately reflected in the Foundation Document and Draft Concept Alternatives. While Alternative B has some the necessary elements to fulfill the NPS duties, it is too narrow in scope and should be combined with Alternatives C and D. The AIHPC strongly supports the use of partnerships, but the list of potential tools for this purpose fails to include historic leasing, which is by far the most promising and readily available avenue to protect historically significant properties. The CRMP needs to recognize and, the extent possible, provide for continued involvement of the historic Isle Royale communities of people in the restoration, maintenance, and interpretation of affected properties. The proposed Foundation Document is a good start at defining the IRNP's purpose and identifying the fundamental themes and resources to be managed. The AIHPC supports the broad and multi-faceted approach relied upon in the Foundation Document, which covers a range of park significance factors and fundamental resources and values.

The statement of park significance in the Draft Foundation Document should be revised to add "historic and cultural resources." In terms of historic objects and resources, the statement only lists "archaeological sites and resources." As required by the NPS Organic Act, all national parks must conserve historic objects and properties. Certainly, IRNP contains a vast array of such resources, and NPS itself repeatedly acknowledged the significance of those resources. No statement of IRNP significance can be complete without a general category for these resources and values.

In addition, categories of historic objects and structures must be included in the list of Fundamental Resources and Values. For example, fish camps, cabins, fishing artifacts and activities, and evidence of human use, occupation and residency should be specifically identified. Many of these properties are protected under the National Historic Preservation Act, and they are a vital element of the IRNP; without them the park falls far short of its intended purpose and public benefit.

The significance of these resources is recognized by the IRNP General Management Plan (GMP), which specifically lists the broad category of "cultural and natural resources" as part of the Purpose Statement. See GMP at 13. The GMP also includes an Emphasis Statement that encompasses not only historic structures and objects, but also the way-of-life and human activities of "Native Americans, European miners, lighthouse keepers, commercial fishermen, and island summer residents." Id. The GMP Emphasis Statement also covers other human dimensions and historic features and values, such as: restoration of the "human spirit;" "simple living;" "how the impacts of civilization have altered natural systems;" "remnants of mining activity, commercial fishing, and the resort era;" "rich maritime heritage;" "the past adaptive fishing lifestyle and technology;" and the "significant island culture." Id. at 14. The GMP also expressly refers to areas of "potential for cultural significance - - fishing camps, life lease cabin sites, and old resort areas" and well as "historic mine sites," and it discusses the importance of "a thriving fishing community of over 20 families" at Washington Harbor and the homes of "summer cottagers and vacationers." Id. at 81-82. The GMP confirms the significance of such properties when it states "much of the significance lies in the harbor community as a whole." Id. at 82. As a result, the Foundation Document most be broad enough to encompass these resources and values that are featured elements of the GMP.

Finally, in addition to the independent value and significance of these historic resources, they must be encompassed within the Foundation Document because of the role they play in defining and enhancing the value of IRNP's outstanding wilderness. This attribute is set forth clearly in the IRNP Wilderness and Backcountry Management Plan (Wilderness Plan). One of the objectives of this plan is to "preserve cultural resources in Isle Royale wilderness and backcountry and foster their appreciation through appropriate programs of protection, research, education, monitoring and treatment." Wilderness Plan at 7. Of course, if the INRP Wilderness Plan creates the objective of protecting cultural resources, such a goal must be integral to the significance and fundamental resources and value elements of the Foundation Document.

In addition, to the objectives statement of the Wilderness Plan, the needs statement of that document states "because cultural sites, such as mining remains and fishing camps can be an important part of the wilderness experience, sites would be monitored to ensure preservation of that experience." Id. at 54.

## The Plan further states:

Cultural sites are an important part of the I.R.N.P. These sites document the diverse human uses of the island over thousands of years. They give perspective to the power of Lake Superior and the isolation of this wilderness island. The visitor can better understand the natural environment when confronted by the past human experience of Isle Royale.

## Id. at 133.

As a result, as NPS has determined, cultural resources like the buildings and structures on IRNP are important not only in their own right, but also because they give enhanced meaning to wilderness. When properly managed, cultural/historic and wilderness resources on Isle Royale not only can co-exist, they are essential to each other.

By acknowledging the interplay between historic/cultural resources and wilderness, the Wilderness Plan, published in July 2005 was in many ways ahead of its time. The interconnection between these values is evidenced in the management theories developed by Dr. William Cronon and Dr. James Feldman. Dr. Cronon explained in the article "The Riddle of the Apostle Islands" published in the Orion magazine in 2003:

The Apostles are thus a superb example of the wilderness in which natural and human histories are intimately intermingled. To acknowledge past human impact upon these islands is not to call into question their wilderness; it is rather to celebrate, along with the human past, the robust ability of wild nature to sustain itself when people give it the freedom it needs to flourish in their midst.

William Cronon, The Riddle of the Apostle Islands, Orion, May/June 2003 at 38.

This same principle applies to INRP, and argues for an accommodation between wilderness and cultural resource conservation. IRNP should now carry forward this wilderness/historic preservation synergy from its Wilderness Plan to its Foundation Documents and the CRMP.

The Draft Alternative Concepts also must be broadened to cover directly and emphatically the restoration, maintenance, and interpretation of all forms of cultural and historic resources. Alternative B comes the closest to doing so, and the AIHPC supports this option over the No Action Alternative, Alternative A and Alternatives C and D, which are not really separate alternatives but appear to be integral elements of what should be a more comprehensive alternative that covers historic properties (B), maritime resources (C), and archeological resources (D). Selecting any one of Alternatives B, C, or D over the other would be inconsistent with the Foundation Statement and result in an incomplete CRMP that fails to carry out important aspects of the NPS mission at IRNP.

The AIHPC strongly supports the emphasis on partnerships set forth in Alternatives B, C and D. It is clear that NPS cannot achieve its GMP goals on the many important tasks of the CRMP without the assistance of other parties. Such help is especially important for historic buildings such as the fish camps and cabins. As the GMP states, "the greatest threat to the cultural landscapes is neglect and attrition over time." GMP at 82. In addition to the harsh climate, the other major threat over time to the potential landscapes has been park development and destruction of key elements. Id. at 82. As soon as the constant care needed by buildings of this type is ended, they begin to deteriorate. Id. at 81.

Sadly, these same factors have already greatly diminished the historic and cultural resources of many national parks, including the Apostle Island National Lakeshore. Facing such major challenges while confronting falling budgets, NPS should make maximum use of the partnership concept set forth in Concept Alternative B.

We note, however, that the alternatives discussion fails to mention the most promising and effective partnership to date for many of the historic resources on IRNP - - historic leases. This flexible and highly adaptive partnership mechanism has been used effectively in many national parks. Congress has directed NPS to make greater use of historic leases, and the recent report on historic leasing in the National Park System issued by the National Trust for Historic Preservation identifies IRNP as one of the most promising areas to make use of this partnership arrangement. The draft CRMP, therefore, should include historic leases among the list of partnership arrangements that can be used at IRNP.

As a final note, and consistent with our previous comment letters, the CRMP should recognize the importance of the continuing role of IRNP residents and families in the restoration, perpetuation, and interpretation of the cultural values and history of Isle Royale. The fact that the heritage of the Island residents persists to this day is, in and of itself, a resource that should not only be used by NPS for partnership purposes, but considered as part of the park's extraordinary history.

Thank you for considering these comments. Please be sure to include the AIHPC on the contact list for future actions related to the CRMP (we have not been receiving NPS notices, despite our previous comments). Please contact me if you have any questions about these comments.

Correspondence ID: Received:

122 **Project:** 33691 **Document:** 

Correspondence: Dec,04,2

Correspondence Type: Web Form

Topic Qu

Dec,04,2013 19:46:27 Web Form

Topic Question 1:

The draft alternatives reveal the preferences of NPS management in the way that choices are separated, and arranged.

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I do not like the inclusion in "Actions Common to all Preliminary Alternative Concepts", the assertions about "Private Residential Use of Cabins". This ad hoc demand is in contrast to the other bullets. It is an arbitrary, capricious dismissal of the long-established cabin culture at Isle Royale.

## Topic Question 2:

Concepts B and C contain brief references to the most threatened cultural resources, mainly the living cultures of the cabin, fishing, and resort people.

Other resources are important, but not under threat. The priorities seem to depend upon budget considerations, rather than resource threat analysis.

## Topic Ouestion 3:

The idea that protection and preservation require identification of threats, many of which originate within the culture of NPS management. Nowhere in this process is there any account of the culture of the National Park Service itself, its historical effects on ISRO's evolution, nor its successes and failures in prior management of ISRO's cultural resources and heritage. How can we make recommendations to an agency that in its past has constituted the chief threat to cultural values and resources? Close oversight by all is necessary, and sufficient time to discover hidden agendas is highly advisable.

## Topic Question 4:

The "Wireless Tower" on Washington Island is an important reminder of a by-gone age. Erected in 1910 just five years after Marconi received his patent for wireless telegraphy, it served as the antenna base for Singerville Hotel reservations connection to Chicago and other urban centers. The Wireless Tower was engineered by the American Wireless Telegraph Co. of Grand Marais Minnesota.

Its national significance is that it is in all likelihood the last surviving tower of the wireless telegraph age. Most towers erected

along the US East Coast were constructed of wood in some haste to participate in the growing transatlantic passenger and shipping commerce. The wireless tower is constructed of galvanized steel, and thus has survived long after others have disappeared.

### Topic Question 5:

Identify threats. Prioritize based on threats of losses. Be honest and forthright in recognizing your own cultural biases, as well as those of your co-workers and superiors. Understand that future visitors and analysts will be critical if not unforgiving of work that is not based upon the primary objectives of unimpaired protection and preservation of the island's rich cultural resources and heritage.

Comments: Additional Comments regarding ISRO Cultural Resources Management Plan 12/4/2013

A proper cultural resources management plan requires the following:

1.that goals of the organization implementing the plan should be identified. {Protection and preservation of cultural resources to the maximum extent that is feasible}

2.that the present status of items associated with goals should be established, and differences between the present and desired status of goal items {requires inventory of items and detailed ethnography}

3.that actual and potential resources for use in achieving the goal states should be identified. {including financial, managerial, cultural and other human resources presently available and able to be available in future}

4.that a time horizon for transition from the present state of affairs to the goal state should be identified, in view of the resources that are available to be applied toward goal achievement.

5.that an agreed-upon method of measuring progress and eventual success be applicable at many points during the CRMP development process.

6.an effective means of detecting and reversing effects of policy designs or bureaucratic actions that are counter productive, subversive, and damaging to the achievement of protection and preservation goals. This can occur when actors in the planning process are in a position to implement choices and decisions through authoritarian power, as is the case with Park management.

Valuation and appreciation of existing cultural resources and human activities associated with such resources is of great concern. US history has many sad examples of the destruction of irreplaceable cultural resources through ignorance, negligence, myopic cultural viewpoint, and bureaucratic arrogance. Since the planning process is in the hands of a bureaucracy that has its own culture and goals, it is necessary that full information of their decisions and actions be available for scrutiny. It is also necessary that sufficient time be available for the public and concerned parties to conduct an analysis of the CRMP process as it moves along. The CRMP design, development and approval process must not be diverted or subverted by the National Park

There is an obvious and glaring case in point at Isle Royale. Commercial fishing had long been practiced as a complementary and sustainable activity of interest to visitors. It is of educational and research value to researchers and students, and of economic value to fishermen as producers and to the public as consumers. A policy on commercial fishing at Isle Royale was formulated by NPS Director Conrad Wirth in 1955, and regulations to codify, support and protect the ongoing fishing was passed in 1956 in the form of 36CFR20, Isle Royale Commercial Fishing. Nevertheless, beginning in the 1970s the NPS began a policy of refusing to allow transfers or renewals of the permits called for in 36CFR20.

With the passing of Clara Sivertson in May of 2010, the current ISRO superintendent stated that Clara's permit to conduct commercial fishing was non-transferable. Thus the superintendent arbitrarily and capriciously halted a cultural activity that had continued since the 1830s.

The superintendent claims to have found evidence in the park's establishment documents that commercial fishing at Isle Royale is "incompatible with the park", and that the fishing cessation was mandatory as life lessees passed away. No documentary evidence of such requirements of fishing cessation have been furnished by NPS authorities to back up the superintendent's claim. Nor is there support on fishery management grounds for the NPS policy of suppression and destruction of this primitive, but interesting and useful activity.

Whether or not commercial fishing can be restored to the cultural landscape of Isle Royale, we must acknowledge that biases by NPS management can have a profound effect upon evolution of cultural life and cultural resources treatment at Isle Royale. The importance of commercial fishing at Isle Royale is supported by an ethnographic study, by the history of Isle Royale's fishermen in the research, planning and implementing of the rehabilitation of the Great Lakes lake trout fishery in the wake of the lamprey invasion. Furthermore it is supported by decades-old NPS policies and by the Code of Federal Regulations in 36CFR20. The fact that this culturally significant activity can be destroyed by a superintendent's ukase is ample evidence, I believe, that personal biases by powerful authorities can play an unfortunate role in cultural resource management planning and implementation.

The "Actions Common to all Preliminary Alternative Concepts" bullet point 4 may show the intractable mindset of CRMP process developers. As one of the few statements of NPS planners that reflect their attitudes toward cultural activities it reveals their preferences for destruction of existing cultural connections of people with Isle Royale by severing their connections with familiar structures. It shows a particular lack of appreciation for the work, sacrifices, history, and financial costs associated with the preservation of resources that now exist, many in pristine condition, due to private care and initiative. It reveals the profound cultural gap that exists in park planners' perceptions and the reality of human connections with wilderness. It is reminiscent of the numerous, sickening "pack and move" orders emanating from the Department of Interior throughout history, when blacks, Native Americans, farmers, herders, and workers were uprooted under the rubric of accomplishing some planning objectives. Bullet Point 4 discloses the National Park Service's modus operandi for accomplishing its "final solution" in the cultural cleansing of Isle Royale.

The National Park Service has no business asserting, "Actions Common to all Alternative Concepts", whether "Preliminary" or not, as a non-negotiable planning demand. The NPS does not own Isle Royale! When the NPS serves properly as trustee it

manages parks for the benefit of the People of the United States. The NPS's taking the special use permits and other options off the table is acting in bad faith as a consultative planning participant.

The facts are that many of the threatened cultural resources at Isle Royale can be protected and preserved at no cost to the NPS or to the US government. The answer is simply to allow families to carry on as in the past, or to recruit culturally connected families to commit to protection of resources that they are familiar with. The NPS needs to learn to swallow hard and accept the idea that long term assurances of access are required to attract more than casual committment. But it seems that in the mind of CRMP planners "modest preservation treatments with short, selective timeframes" is the most that the NPS can stomach. (See bullet 6 of alternative B)

The alternatives concepts are needlessly exclusionary. While budgetary considerations may constrain many projects, nevertheless many worthwhile goals across several of the alternatives can be accomplished with little cost to the government. However, some of these low cost alternatives do not seem to comport with NPS objectives for cultural exclusion at Isle Royale. The losses to significant structures, knowledge, history that will be attendant upon the NPS exclusionary policies nnecessary. The losses, though regrettable, are attributable to the NPS's own parochial corporate culture. It prefers close control over visitors, ephemeral connections between civilians and park resources and devaluation of cultures that might be competing with the law enforcement ethic of the NPS.

The mandate of the National Park system is to preserve and protect the system's natural and cultural resources unimpaired for the enjoyment of present and future generations.

The active participants in National Park Service management need to take a fresh look at their own attitudes, biases, cultural notions and past actions. The People of the United States deserve the kind of service that is implied in fulfilling the purposes of the National Park system.

Correspondence ID: Received: Correspondence Type:

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123 **Project:** 33691

Dec,04,2013 20:53:54

Web Form

Topic Question 1:

Regarding the proposed Alternatives, alternative A is too narrow. Alternative B is too vague. Alternatives C and D isolate cultural resources, are very narrow and view individual cultural resources in isolation.

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In addition, I am very concerned about IRNP's suggestion that it might be acceptable to highlight one cultural resource on Isle Royale at the expense of other cultural resources. I understand from cultural resource preservation professionals, that the approach of saving one group of cultural resources at the expense of other cultural resources is "bad public policy" and "bad preservation policy". This concept compromises the intrinsic value of the rich, multi-layered, overlapping, and intertwined story of the human presence on Isle Royale.

I've spent the last 40 years absorbing as much information as possible about the cultural resources on Isle Royale. I've leaned on former and current residents, park service and park concession employees, long-time visitors, and scientific and cultural resource scholars to share their perspectives. In addition, I've spent a significant amount of time trying to assess what if any value exists in trying to preserve what remains of the Island's cultural resources and potential management policies that would maintain the highest and best value of these resources. My personal interest has paralleled Isle Royale National Park's increasing interest and appreciation for the Park's cultural resources. The Park's interest began with many of the first Park Rangers and continued in earnest when the Park hired its first cultural historian in the 1970s.

There are clearly significant cultural resources that are important from a societal perspective to preserve on Isle Royale. The resources personify both the human experience on the Island and more broadly, the full spectrum of the human response to isolated "wilderness" in North America for the past 4500 years.

The cultural resources on Isle Royale include an extraordinarily valuable collection of historic artifacts, structures, landscapes, and ethnographic resources that represent a continuous and often overlapping human experience in wilderness. Equally important, the cultural resources are located in an extraordinary setting that closely matches the wilderness environment that the original families and visitors experienced.

The highest value of the Island is its relative isolation. Isle Royale has always been and probably always will be hard to reach. The archeological resources, historic structures, cultural landscapes all represent the human response to the Island's isolation. These cultural resources along with the Ojibwe and European ancestral families that carry the stories and traditions associated with these cultural resources are an integral part of the "wilderness" story on Isle Royale.

Realistically Isle Royale's cultural resources are in various stages of historic integrity and will require individual and collective assessments for future historic preservation. Laura Kirn's recent PhD thesis "A Storied Landscape" provides an excellent outline regarding potential management treatments for historic structures and cultural landscapes in designated wilderness. Kirn's management treatments are silent regarding continued use of these resources but her core philosophical approach could be applied equally to management treatments for ethnographic resources and traditional uses of these resources.

Correspondence ID: Received:

124 **Project:** Dec,04,2013 22:28:59

33691

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Correspondence Type: Web Form

### **Correspondence:**

# Topic Question 1:

I do not support alternatives no action, A,C and D because they favor one type of cultural resource over another. There are over 100 surveyed and documented historic structures at Isle Royale and they would be left to molder and disappear under those alternatives. Alternative B is the only choice that offers a proper broad perspective on cultural resource management and protection.

Very troubling is the fact that the NPS has not followed Directors Rule #28, which requires a comprehensive ethnography consisting of an Overview and Assessment. This vital requirement provides the necessary baseline data that is needed as part of the planning process. The planning process should not proceed until this required information is assembled.

It is as though NPS is attempting to disavow the clear fact that there has been, and continues to be, a rich human history on Isle Royale. NPS is ignoring the Context Study completed several years ago by Dr. Phil Scarpino. This study was funded by the NPS and National Trust for Historic Preservation.

### Topic Question 2:

Alternative B provides for broader cultural resource protection and stresses the importance of partnerships in this effort. The traditional families of Isle Royale continue to maintain, in accordance with NPS guidance, the historic structures and community practices and traditions established by previous generations.

We should look to solutions that have been achieved in other national parks that employ leases and partnerships that ensure the long term preservations of traditions and historic resources.

### Topic Question 3:

Yes. The Potential Wilderness designation for areas at Isle Royale that have structures and other community elements should be removed. These areas constitute less than sixth one hundredths of one percent of the land area of Isle Royale. Other national parks have successfully worked with Congress to modify wilderness designation areas in order to preserve cultural resources., and Isle Royale should do the same. As I said previously, the potential wilderness areas and their required abscess of historic structures is a contrived and incorrect attempt to manufacture wilderness. This as stunted the development of plan alternatives.

## Topic Question 4:

Yes. Get the ethnographic baseline data that is required by NPS rules and recognize the rich culture and community that continues to this day on Isle Royale. This resource sets Isle Royale apart from many other national parks. Please also recognize the clear fact that everyone is a seasonal inhabitant of Isle Royale, including NPS administration itself. The story and traditions of the families who lived and worked at Isle Royale is a testament to their determination and love of home. And please also recognize that non fishing families also pursued their occupations at Isle Royale.

### Topic Question 5:

Wilderness and cultural resources / history need to be on equal footing as this plan proceeds. The foundation statement does not mention history, and though it mentions wilderness, it does not mention cultural and ethnographic resources.

We expect that the designated Consulting Parties will be at the table to actively work with NPS to develop draft alternatives, as required by NPS rules. We should also be open to having neutral mediation as part of this process. Cape Cod and other parks have used this with ultimate success in crafting a plan that will preserve important and irreplaceable cultural resources.

Comments: Don't squander this chance to do it right.

Work cooperatively with consulting parties to engage partnerships that can make this park a showcase of mature and creative collaboration that preserves exceptional cultural resources and community without compromising the wilderness that drew people there for hundreds of years, inspiring them all the while.

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Correspondence ID: Received:

125 **Project:** Dec,04,2013 23:07:40

**Correspondence Type:** Web Form **Correspondence:** 4Dec 2013

Dear Isle Royale National Park Service Officials,

Dear Isle Royale National Park Service Officials,

33691

**Document:** 

I write to you today with regard to the Cultural Resources Management Plan (CRMP) for Isle Royale.

I have studied and explored the island and experienced and observed its natural and cultural resources.

I have had the good fortune to camp in a variety of sites, hike many miles on and off trail, and have, by canoe, paddled Lake

Superior and many of the islands inland lakes.

The natural resource with its predator prey relationships is a priceless treasure and the cultural resources that remain, scattered across the archipelago provide descriptive chapters to the human story as it was and as it continues to unfold by the summer residents, researchers, visitors and park staff.

I believe the CRMP for Isle Royale needs to preserve a broad range of the cultural resources and not a narrow selection of them. Focusing on only narrow segments of cultural resources is tantamount to tearing out chapters from the island's book of the human experience.

It is my understanding that the NPS is mandated to do ethnography's and this should be done prior to moving the CRMP forward

I've also read that in other national parks have or are currently removing areas being considered for reversion to wilderness.

IRNP has about 0.06% bing considered for reversion. Congress, if asked, has the power to remove this area from reversion resulting in allowing the NPS, in partnership with other consultants to work to better preserve the cultural resources.

The National Trust for Historic Preservation supports efforts of this nature and might also find support from the historic interests of the state of Michigan.

Please preserve a broad range of cultural resources the past and the living. Not for us but for those who follow.

Your careful consideration of this matter is much appreciated.

Sincerely.



**Correspondence ID:** Received:

126 33691 **Project:** 

E-mail **Correspondence Type:** 

Correspondence:

**Document:** 55915 Dec,06,2013 00:00:00

1: The highest priority should be a oral history with people who have a recent direct connection with the Island. Preserving their stories and memories is a once in a life time opportunity that shouldn't be missed. Ideally the interviews would be at the site(s) of the events they're recalling to not only make them more meaningful and engaging for the viewer but perhaps to facilitate some future interactive experience for island visitors. To defray the costs of the oral history project the park could consider partnering with media outlets/producer such as television stations, cinematography schools, etc. A list of existing oral histories (if not the histories themselves) concerning the island should be published on the park's web site and perhaps at other locations/facilities.

- 2: Show reverence for the Native American culture.
- 3: Steps should be taken to preserve unique physical artifacts, ideally in their historical setting.
- 4: Life lease holders, their descendants, and other interested parties should be encouraged to renew their conditional use permits provided:

They maintain the property in an environmentally benign manner and limit modifications of historic architecture.

Two or three time a year a year visitors should be allowed to tour these properties. The tours should be planned weeks if not months in advance to allow lease holders and visitors to plan accordingly. Group size should be limited so as to minimize damage. Perhaps the lease holders could participate in giving the tours, particularly if they are also participants in the oral history project. The park may want to consider making exception to its ban on electronic devices to facilitate the showing of a relevant oral history on site. Alternatively actors could be sought to play roles of former inhabitants.

Correspondence ID: Received:

Dec,03,2013 00:00:00 **Correspondence Type:** 

Correspondence:

127 Project: 33691

**Document:** 

55915

E-mail

To whom it may concern:

Re: Cultural Resources Management Plan Alternatives

Date: December 3rd, 2013

I suppose it is pointless to criticize this process, nonetheless I'm going to register my complaints.

This is the best you can do after 4 years? Really! I realize that Isle Royale is way under the radar given the low visitation, but these proposals are so obviously inadequate it is embarrassing. It appears to me to be eye wash for the public by obscuration via vague and meaningless platitudes and jargon. For example, in Alternative B you talk about a "vibrant program of partnership". What's stopping you? The National Trust for Historic Preservation (NTHP) and the Isle Royale Families and Friends Association (IRFFA) have been trying to talk NPS from the Director on down, but no meaningful discussions have taken place. I especially call out the Superintendent for her failure of leadership.

The other point regarding this process is that NPS has made of farce out the so called Consulting Parties. You don't even pretend to make an effort to work with any of them particularly IRFFA, the one organization with members who have actually done anything to preserve the history and cultural on the island. These families who have been coming here for many generations have been working hard to preserve the history and cultural on Isle Royale and not one time to my knowledge have they been given any credit, thanks or encouragement. We all know what would have happened to all the "private" buildings & docks around the island were it not for the unpaid efforts at the out of pocket cost of thousands of dollars and many man hours by the original families and friends.

Instead you have alienated most of us by breaking a major commitment made in writing by the Superintendent in 2006 to not make changes to permits until the CRMP is completed. That would have been a very wise promise to keep as it would have kept everyone working on the docks and buildings during the lengthy time it takes for you to make up your mind on what to do about these places. But the Superintendent decided to break her commitment on permits and to add insult to injury put government locks on most of the (already secured) buildings and actively discourages us from working together and helping each other via petty access policies which destroys the whole fabric of the cooperation/help your neighbor culture on Isle Royale.

#### Comment Card Comments:

What do I like/don't like about the proposals you ask? Since there are no specifics, how in the world can any one make intelligent comments. Over these last 4 years, besides talking to yourselves, what have you been doing to figure out a sensible plan to preserve the cultural landscapes that dot Isle Royale? How specifically do you propose to do so on into the future? I know you would love to work with large universities and not for profits. Putting like minded professors, students and dreamy eyed idealists on Isle Royale looks good on paper until you realize they have to know a thing or two about the place to make such a strategy work. Continuity is a very important factor in preserving these properties. But you know that, don't you?

Which is the best alternative? None of the above! Here is what you fail to grasp. There has been more real preservation work done in Washington Harbor, to name one example, from the early 1990's to 2011 without any of these so called alternatives and before the NPS locked down the buildings. It is hard to imagine how NPS will ever get that kind of work done in the future with out a boat load of money you say you don't have and an eternity of planning and discussion. Look how long it took you to put out an 8 page (actually less than 3 pages of) planning document!

Ray Cottage in immaculately restored, Johnson Island buildings rebuilt, Old Hotel stabilized, log cottage next to Andrews restored just to name a few (and not including regular maintenance).

Yet you peremptorily rule out working with the very families that did this work by extending what you call "private residential use permits" (a loaded term that doesn't encapsulate what is actually going on). This alternative would receive support and be favored by many but you won't even consider it. Why not?. After all this is the very alternative that has been proposed NTHP and included in Dr. Scarpino's report. It is also been proposed in Cape Cod National Seashore with similar cultural resources by an independent expert hired by NPS. IRFFA has provided you with that example and others. Why not hold a public meeting and discuss that possibility? Clearly NPS has a aversion to the word "private". I understand why, but I think NPS needs to more open minded if you goal is to actually preserve what's left up there.

Your problem is that you don't even understand the fundamental issue here. Some how you think thequestion is whether or not the properties should or shouldn't be preserved at all. All the experts you have brought in have told you the same thing. Preserve all of it, because it is a collection. Saving one building here and one there without the whole diminishes the value of all of it. Secondly, they have told you, keep the people who have an ancestral connection on the island as long as possible because that is the only way to have authentic cultural resources preserved on Isle Royale.

NPS is "template" organization where one size fits all continually trying to jam round pegs in into square holes. You believe that if you if you just sound high minded enough, check all the boxes most everyone will either fooled or satisfied. But surely you cultural resource people must see the uniqueness of what is up there. Without strong leadership, vision, and passion for preservation your efforts will be inadequate and fail. It won't be long before the "UNSAFE DOCK/BUILDINGS" signs go up around the island and the families who's ancestors built them completely vanish from Isle Royale. I know that will be a celebration day for some who work at Isle Royale.

In conclusion, and in the kindest way I can say it, your 8 page planning document (3 pages of actual planning info) after 4 years is deficient and weak.



Correspondence ID: Received: Correspondence Type: Correspondence: 128 **Project:** 33691 **Document:** 55915 Dec,04,2013 00:00:00

E-mail

submitting my brief (updated) below in response to Tim Cochrane's TAP paper which Phyllis relied on for her TAP. We are requesting that the NPS reverse that determination.

Tim Cochrane's analysis of the summer residents begins with the mistaken notion that the fourteen families left on Isle Royale are "former" summer residents. We are anything but former. We are at Isle Royale in the summer and we remain active with Isle Royale projects in the winter. For example, when visiting in January of 2011, he asked me what projects I had in mind for the next summer so we compared notes on plans for that summer.

Tim Cochrane attempts to dismiss our meeting the TAP criteria with a term never before associated with our families: "summer recreationalists", which makes summer residents sound like we are there for solely "recreational" reasons. A better term would be "Isle Royalers",

Although we fish, boat and hike, we also have spent countless hours working on aiding the park through organizations such as the Isle Royale Natural History Association. Isle Royale Boaters Association and the Isle Royale Families and Friends Association. We have lectured at Isle Royale and In Minneapolis, Duluth, Chicago, Detroit, the North Shore and elsewhere on Isle Royale to groups interested in hearing about the island.

Tim Cochrane cites as a negative that a majority of the life lessees "no longer have a summer home." He does not hold that against the descendants of the commercial fisher folks at Isle Royale, only four of whom have been able to maintain their homes.

One of Cochrane's biggest mistakes is claiming that we "Isle Royalers" have "fewer of the community or cultural attributes of the commercial fishing families." He says that "most of the social interaction was family (versus community) bases. He came t this erroneous opinion without interviewing our families or understanding how great our interactions have been over this past
century.
Superintendent Cochrane also makes the absurd comment that we did not have "a livelihood that was directly dependent upon Isle Royale resources or time on the island." Does he not know that our life leases and special use permits prohibited such a thing?
umg.
And then Mr. Cochrane says we hardly ever came to the "aid of one another." How would he know that when he spent preciou little time at the island and never interviewed our families on this subject, or any others.
-
There are many other examples of families helping each other.

As for the attributes Cochrane lists for a traditional community, we Isle Royalers meet each of them. We are multi-generational, a community that exists historically and continues to exist. Each family history goes back over 40 years prior to the park being established. We share culture, customs and beliefs well grounded in the community history. We continue those attributes today. Finally, we take pride in continuing the cultural identify of our Isle Royale community. This is shown in many ways including our strong and active participation in the Isle Royale Natural History Association and the Isle Royale Families and Friends Association.

It is unfortunate that Tim Cochrane has issued such a report without interviewing the Isle Royale families, understanding our common values, interactions and our history. He ends his report implying that all we do is vacation there in our "former homes", as though our places are not our present homes.

His paper quotes a number of academic sources but the facts are that our remaining Isle Royale families meet the National Park Service criteria. Many of the academic sources he mentions talk about other factors, such as "social control" which are not part of the NPS criteria. His reach in this respect is not only irrelevant but a slap in the face to those of us who live and breathe our Isle Royale heritage.

Based on the above, and the many other examples we could give, we respectfully request that the Park revisit this issue and designate our Isle Royale families as traditionally associated people of Isle Royale.

Correspondence ID: Received: 129 **Project:** Dec,10,2013 00:00:00

33691 **Document:** 

55915

Received: Correspondence Type:

E-mail

Correspondence:

December 9, 2013

National Park Service Brenda Todd / DSC-P

Isle Royale CRMP Planning Team 12795 West Alameda Parkway

PO Box 25287

Denver, CO 80225-0287

Dear Ms. Todd,

The following are comments from Wilderness Watch on the Cultural Resources Management Plan for Isle Royale National Park. Wilderness Watch is a national nonprofit wilderness conservation organization that works to protect the designated wildernesses in the National Wilderness Preservation System. We appreciate the opportunity to comment on this plan.

Wilderness Watch strongly supports the direction included in the November 2013 issue of the newsletter dealing with "Private Residential Use of Cabins." We strongly approve of the NPS direction that "life leases and special use permits authorizing private residential use of publicly owned summer cabins and commercial fishery bases will not be extended." We understand that this direction is common to all preliminary alternatives. We believe that this direction best benefits the national constituency and national interest in Isle Royale National Park and Wilderness.

The November 2013 newsletter describes four preliminary alternative concepts, in addition to the No-Action Alternative. Wilderness Watch supports the direction found in Alternative A. This option preserves the fewest number of historic properties. Most of the structures in designated wilderness and potential wilderness would be documented and allowed to deteriorate or would be removed.

Wilderness Watch believes that the direction found in Alternative A best balances the obligations under the Wilderness Act, while still fulfilling the direction found in the National Historic Preservation Act (NHPA). The prime directive of the Wilderness Act is to preserve the wilderness character of the areas designated as wilderness. Wilderness character is best restored and preserved by minimizing or eliminating buildings and structures in designated Wilderness.

Alternative A best enhances the wilderness character of the Isle Royale Wilderness.

Please keep Wilderness Watch on your contact list for further steps in the development of the Cultural Resources Management Plan for Isle Royale, and thanks for this opportunity to comment.



Correspondence ID: Received:

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Received: Correspondence Type: Correspondence: Dec,10,2013 00:00:0 Letter

- 1. I don't think the elimination of Life Leases is such a good idea. These people are as much of the history to the Island as anything else is! I know if my family was affected by this I would fight forever to overturn these decisions. With government funding so in jeopardy these days, these family financial resources to maintain these cabins could come in handy in the future. Don't kick them out!
- 2. In my life, I've made trips to Isle Royale on my boat, so naturally maintaining maritime resources is important to me. The replacement of the docks at Tobin harbor and somewhat improvements to Rock Harbor and Winndogo docks have been greatly appreciate. Working on fuel costs and availability of fuel at Rock Harbor could make visitation to the Island by boaters more frequent.
- 3. Welcoming partnerships for funding projects is so important for our National parks these days. The Isle Royale Boater's Assn. is ready to help with infrastructural needs throughout the park. Please welcome our help!
- 4. I think the National Park Service at Isle Royale needs to listen to their employees about the needs of infrastructure throughout the park. Now is the time to improve bridges and walkways (wooden) or trails before it's too late. I know funding is critical but we need to act now!

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Correspondence: Type: Correspondence:

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2. Alternative B. We need to preserve all eras of history represented in the park. Each historical site is part of Isle Royale's story.

Correspondence ID:

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**Document:** 

55915

Received:

Dec,10,2013 00:00:00

**Correspondence Type:** 

Letter

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1. Bona Fides.

For me and my children, Isle Royale will

always be sacred terrain. Nothing matches the beauty of the Minong Ridge.

- 2. Preferences. Although I might prefer Alternative A, in deference to boaters and lodge visitors, I would also be comfortable with Alternative B, with the hope that all pre-1940 human traces in wilderness areas would be allowed to deteriorate naturally. I would like to see the fire towers removed. A few traces of human exploitation dramatize the rugged beauty of Isle Royale, but I would not want to watch Isle Royale become a theme park.
- 4. Save the Adirondack huts.

Correspondence ID:

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Received: Dec.10.2013 00:00:00

Correspondence Type: **Correspondence:** 

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1. Alternatives C and D are too narrowly-focused. There is more to the island's history than maritime use or archeology. Focusing on one of these would exclude too many other aspects.

I do not like Alternative B's emphasis on pursuing partnerships or the option of adaptive.compatible reuse of structures. Too much for a wilderness park.

- 2. Alternative A because it is broad-based, maintians the fewest historic properties and seems most compatible with Isle Royale as a wilderness park. So many structures are already gone; this alternative would complete the process, while still addressing all types of cultural resources.
- 3. Just because the "latest chapter" of human endeavors on Isle Royale is extant- the resort era with life-leasee cabins- doesn't mean the park has the greatest responsibility to this cultural resource. "Save" a few structures to interpret this part of the island's history. I think all of the "histories" are part of Isle Royale; a CRMP should also address mining, fishing, precontact use.
- 5. I do not think the idea of culture camps, field schools "fits" on Isle Roayle. Too many people.

What is a shame is that proper interpretation of sites is no longer available to visitors. NPS interpretive rangers should accompany concession trips to the existing cultural sites- the Edisen Fishery, Minong Mine, Passage Island. Visitors will not receive accurate information at these sites if interpretive rangers are in short supply.

Correspondence ID: Received:

**Correspondence Type:** Correspondence:

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Letter 1. I like that the alternative concepts are well thought out and involve documenting the historic structures on Isle Royale. I do not like the idea of removing historic structures. During my visit to Isle Royale, I very much enjoyed visiting these sites.

- 2. I prefer Alternative B. I believe all of human history on the island is of importance and no one should be highlighted over the others.
- 3. I would like to see unsafe sites on the island stabilized or in the case of sites that are not visually appealing (or already destroyed) removed. However, I'd like to see the majority of the islands sites maintained as a balance of history and nature such that Isle Royale continues to tell its entire story.
- 4. I really enjoyed Graveyard Island. I would like to see it safely maintained, but not restored. The mix of nature and man make this site very special.
- 5. Once history is removed, it cannot be restored. Also, regardless of the alternative, I would like to see all sites studied and documented.

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Received:

**Correspondence Type:** 

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2. Alternative C

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Received: Correspondence Type:

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- also allows for the possible use of partnerships. 4. Consider preserving some of the privately owned cabins as they become available to the Park Service.
- 5. Better advertisement of the process is needed. I was made aware of the comment period by Vic Forester in a presentation about his book.

2. Alternative B. This is the most efficient plan to preserve the highest number of historic properties with limited resources. It

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1. The alternative concepts do provide a variety of options.

Alternative "A" is too severe, minimum number of cultural resources.

Alternative "B" is too broad is scope to be practical Alternative "C" highlight natural interest of this island

Alternative "D" is too narrow

2. Combination of C and D. Limited scope, but with wide interest. Great deal of possibilities for public participation, which builds support for plan and ISRO.

3. NA

- 4. A sampler of cultural sites in Tobin Harbor should be maintained. Important criteria (a) structural integrity, (b) dock with good water depth, (c) ease of access for maintenance and promote visitation, (d) access by land trail.
- 5. Thank you to all for all the hard work!

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**Correspondence Type:** Correspondence:

Letter

- 1. I believe it would be a mistake to not renew or extend private residential use of cabins and commercial fishery base(s) or volunteer-in-park agreements. I believe that their continuation would best preserve that part of the island's history.
- 2. Alternative B appears to best preserve and protect the full range of historic resources in the park, as it seems to be the most aggressive in accomplishing that. Also the part of Alternative D that proposes greater archeological attention to areas of the park that have been neglected in the past, i.e., "the island interior, relic shorelines, and submerged settings", should be added to alternative B.
- 3. You may be doing this already, but interpretive signs identifying and explaining historic features, such as is being done at the Johnson (?) cabin at Chippewa Harbor, should be done for historic features, including buildings, docks, mines, railroads, roads, etc. Also for the origin of the existing trail network (was it the CCC?) and Adirondack shelters.
- 4. The buildings/cottages near the mouth of Tobin Harbor should be preserved and not allowed to deteriorate.
- 5. Some interpretive information dealing with ecological/landscape changes in the Island would be desirable. For instance, the open ridge east of the Ojibway fire tower, was it open before the 1936 fire?

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1. I like that its proactive. I like that there is smart-thinking and planning, as there should be.

- 2. I like Alt c, because I'm a fisherman at heart. Also, Alt D, as long as any "Brick and Mortar" or development to accommodate groups of people is excluded smartly.
- 3. I think every square inch of that island is important.
- 4. NA
- 5. Maybe off topic, but I'm a small-boat fisherman and really appreciate the docks.

Correspondence ID: Received:

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1. I am pleased to see the alternative concepts established by the team. Isle Royale has a wealth of historic property and archeological sites that should not be ignored.

I certainly believe that the no-action alternative is a poor choice and that a lot can be accomplished within the other alternatives. It is of utmost importance that partnerships be developed and/or expanded to accomplish the objectives.

2. I am not interested in seeing the development of alternative B.

we can't

undo the past. They also burned the net houses, fish houses, etc. of the fisherman as they left. We can, however, learn from our mistakes, and not make the same mistakes now and in the future. There are still many historic buildings that need to be preserved or renovated, and not be allowed to deteriorate or be destroyed.

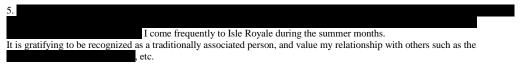
As was indicated in the meeting in Duluth on November 20th, much work has been done by various individuals and groups, such as that done, for example, on Washington Island, and Barnum Island.

3. I am pleased to see that increased communication is beginning to occur with commercial fishing families, historic preservation people, and other organizations that could expand the alternatives. I am very disappointed in the position-taken regarding life leases, special use permits, and the volunteer-in-park agreements. It has been acknowledged that the NPS does not have the time and resources to preserve these historic sites. What has been preserved in years past, including recent years, has largely been through the efforts of traditionally associated persons and their descendants. What is the value of opposing the

efforts of these persons who are willing to try and preserve these historic sites? On the contrary, they should be expanded! I don't believe that there would be any opposition from the position that special privileges are being or would be extended to these individuals as has been suggested.

4. I frequently use the screen shelters at Grace and Beaver Island.

I want my grandchildren to become familiar with Isle Royale. I would like to see a few more screen shelters at places such as Thompson and Johns Island. In an effort to preserve the historic buildings, I would not favor shelters at Washington or Barnum Island.



Correspondence ID: Received: Correspondence Type: Correspondence: 141 **Project:** 33691 **Document:** 55915 Dec,04,2013 00:00:00 Letter Nov 252013

ISRO CRMP Planning team

Following are some of my thoughts regarding the upcoming ISRO CRMP. First, to address

commercial fishing sites on Isle Royale, upwards of 40 commercial sites have existed, starting in the mid 1800's, with a few sites inhabited at present. These sites were generally rather spartan but comfortable and well maintained while being used. From the 1940;s through 1962 most of these sites were abandoned, many around 1962 when commercial harvest of take trout was suspended by Michigan DNR due to lamprey and smelt predation. When abandoned most of these sites were allowed to deteriorate or otherwise disposed of by NPS. In 1965 Michigan DNR offered fishermen to once again harvest lake trout, whitefish and herring by participating in an assessment fishing program with quotas per species established. Five fishermen chose to participate in the program; Sivertson, Rude, Holte, Edison, and Milford Johnson. While participating in this program these fishing sites continued to be welt maintained while maintaining the historical character of the site. Fisherman at each site were granted a Special Use Permit by NPS, but as these permit holders died off permits to third generation family members were denied by NPS, thus eliminating continued assessment fishing at all sites except Edison fishery which has been operated as a demonstration fishery by NPS. The Holte site on Wright Is. Has deteriorated significantly due to tack of regular use and maintenance. Other fishing sites that have been regularly inhabited by family members continue to be maintained so as to be representative and liveable although some of the historic infrastructure may be gone or in some disrepair. One thing that should be noted from the above is that while commercial harvest was allowed, a portion of the generated funds could be used for regular maintenance, now that those funds are no longer available an additional financial burden is placed on the inhotder. As all material and transportation costs as well as labor has been the responsibility of the in holder, stabilization of these sites has been accomplished through out of pocket funding by the inholder and private individuals who have generously contributed transportation, material and labor.

These sites therefore have been (in almost all cases) maintained at no cost to NPS.

Apparently there have been cases where NPS personnel have been questioned by some visitors as to why some in holders have some jurisdiction and permission to occupy certain sites. It would seem to be an obvious answer to inform them that the site in question has been built and subsequently maintained for decades by the in holder family without use of taxpayer dollars.

Considering which management alternative would be most beneficial in preserving and interpreting the historic aspects of these resources it would seem that the no action alternative would be preferable providing "current management activities" would reflect policy practiced at the time VIP permits were issued and that family members and/or individuals with longstanding association with each site were recruited as "occupants".

Under this alternative and with these conditions the site could be managed with minimal cost to NPS and a knowledgeable interpretive programs could be presented. This alternative

could also allow historic "cottage" sites to be maintained at minimal cost to NPS if family were to inhabit and take responsibility for upkeep. How this would affect other cultural sites eg; Island Mine would be a question. In the 1950's I made a number of trips to Island Mine and found the sight open with remnants of the mining in good view. Then on a return trip in found the site overgrown with no apparent attempt to stabilise. That was disappointing and if that is current policy with this and other sites it would be a shame.

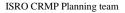
One issue that I will address here is that of "potential wilderness" designations at certain sites. Apparently in or about 1978 land areas of IRNP were classified Wilderness, Potential Wilderness, Non Wilderness or Developed. Some areas including Fishermans Home and Mattson fishery in Tobin Harbor were designated Potential Wilderness even though they were developed areas, continuously occupied since the late 1800's. Why they were so designated is "water over the dam" at this time and it is also my understanding that the designation would be quite involved to change. I also understand that certain restrictions regarding such things as power tool use in wilderness or potential wilderness may be lifted if circumstances make it advisable. In reading parts of The Wilderness Act of 1964, on which most of the regulations and restrictions seem to be based, it is obvious that the banning of power tools relates to man made noise level. Lets look at the reality of the situation;- At Mattson fishery, the float plane that provides passenger service to the island regularly flies over on landing and take off, meanwhile the Voyager II Making 3 trips weekly regularly stops at the mail dock located a few hundred feet from the Mattson site, blowing fog whistle when conditions require. Fishermans Home Is a small cove in which 2 docks and 7 buildings are located. There are no trails coming into the site; the nearest trail is about 5 miles away separated by a 300 ft high ridge. There are regularly one or more power boats at the docks and one or two of the buildings are regularly occupied. Also almost all of the boat traversing the "south side" of the island pass within ¥2 of the site. I can't imagine that paddlers entering the cove would expect to hear no man made noise under these conditions. I mention the foregoing only to point out that in areas as described above, regardless of what final plan is adopted the issue of potential wilderness will probably have to be considered and a variance to allow use of power tools would be advisable to complete various projects whether undertaken by group or individual.

Although each alternative focuses on certain aspects of cultural resources it would seem that the final plan would ,in essence, be a combination of portions of all draft alternatives. Consider historic sites which no longer exist; The Singer hotel, the Washington club, the lumberjCCCcamp in Siskiwit Bay, Cippewa fishing and resort site, Daisy Farm CCC camp, Tobin Harbor guest cottage, Belle Isle resort; - comml. Fishing sites included but not limited to; Booth island complex, Hay bay (3 sites), Little Boat Harbor, Art Sivertson site, et. al. Most of these sites were disposed of by NPS in one way or another, some deteriorated naturally. Sites still existing include; One Singer guest cabin, the Johns Hotel, Long Point (marginally), Rock Harbor resort site - one original? building. In addition, a number of commercial fishing sites, mine sites both historic and prehistoric, light houses, and underwater resources. It is unfortunate that many historically significant sites have been eliminated. Hopefully they will be accurately portrayed in interpretive programs. Example; Do NOT portray the actions of historic loggers or miners through a set of modern day eyes, rather do it in terms of conditions existing at the time of their activity.

When the preferred alternate is presented I assume relative NPS costs will be addressed. It would seem that the No Action alternative would be the least costly as presented, although with NPS playing a largely reactive role costs could vary significantly from year to year. Would this present problems when funding is requested? Is funding for this still largely based on what you spent last year? The No Action alternative refers to "private or nonprofit partnerships and agreements, and under the heading " Private Residential Use of Cabins" it seems that VIP permits will not be issued to historic families for occupation and maintenance of historic family sites. It seems that family occupation has historically been an effective management tool. If that is no longer acceptable it would seem that the park risks losing a valuable and economical resource. It would also seem that this would apply to all alternatives.

I believe that that NPS was formed to function as a custodial entity for land acquired and set aside for public enjoyment and protection from man made desecration. Minimum NPS presence is considered an asset by most park users. The alternatives would seem to suggest a significant increase in NPS and/or other agency presence may result. Try to guard against Isle Royale becoming overly structured when drafting the preferred alternate. The trail crew performs its mission each year then disappears from view except for specific projects, and while low profile, the results of their efforts are an asset enjoyed by all hikers.

Sometime, in the late 1980's I believe, Isle Royale was designated an International Biosphere Reserve, the model of which consists of a largely unused core area surrounded by a narrow area where man and biosphere interact. IRNP fits that model "to a T" and hopefully man and biosphere will continue to interact for the forseeable future. Without NPS (or other agency) protection Isle Royale would now be 50 miles of over priced and overpopulated real estate, so while I may, at times, be critical of regulations, management policy, or financial decisions, I remain a strong supporter of NPS presence on Isle Royale and look forward to the continued cordial relations enjoyed by NPS and



This is sent as a post script to my document sent under separate cover. In CRMP newsletter #2, under the heading "Treatment for Cultural Resources" we find "treatments vary and range from preservation, restoration, rehabilitation, or stabilization".

We then see; Alternative A: Alternative A requires removal or allows deterioration of numerous historic structures

Most structures in designated wilderness and potential wilderness would be documented and allowed to deteriorate or would be removed.

Alternative D: many structures would be allowed to deteriorate or would be removed and/or relocated.

Alternative C: many resources related to other themes in designated wilderness and potential wilderness additions would documented and removed or allowed to deteriorate.

It would seem that" allowed to deteriorate or be removed" plays a significant role in the planning process yet is left out out of the Treatment for Cultural Resources heading, as this an oversight or purposeful omission?

Alternative C refers to "potential wilderness additions". Are there plans to redesignate some present non wilderness or developed areas to potential wilderness? If so this would seem to be a counter productive step aimed at future removal or restrictions at cultural sites in these areas. I doubt we need additional restrictions on Isle Royale.

Alternative D states "Under this alternative the park would be promoted as a venue for university schools. I don't know exactly what that statement proposes, however I feel that the historical, cultural and wilderness aspects of the park are what should be promoted. Caution; when addressing the wilderness aspects of the park try not to leave the impression in the minds of first time visitors that they will "go where no man has gone before". The reality is that except for a few areas eg. the Siskiwit swamp, the island has felt mans presence in multiple ways over its history, and visitors will likely share their space on IR with others.

I wonder if responsibility for operation and maintenance of the 3 aid to navigation lighthouses has been addressed and/or resolved between USCG and NPS and if so will that be included in the CRMP or is that a separate issue?

Hopefully a synopsis of public input to the CRMP process can be prepared and distributed those on the CRMP mailing list. I look forward to issuance of the preferred alternative, and hope that public comment and input will be solicited prior to formation of the final plan.

Correspondence ID:

142 **Project:** 33691 Dec,04,2013 00:00:00

Document: 55915

Received: Correspondence Type:

Letter

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1. L: They seem to address most all of the resources

NL: the concepts may be overstructured

- 2. The No Action alternative, providing all resources would be stabilized to the extent practical.
- 4. Many historic sites have disappeared over the years. As each site has its own "history" to the extent possible each site, or minimally, representative sites should be preserved for each area and activity.

Correspondence ID:

143 **Project:** 33691 **Document:** 55915 Dec,06,2013 00:00:00

Received: Correspondence Type:

143 Dec,06 **pe:** Letter

Correspondence:

December 4, 2013 National Park Service

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PO Box 25287

Denver, CO 80225-0287

Re: Preliminary Alternatives for Isle Royale National Park Cultural Resources Management Plan

Thank you for the opportunity to comment on the planning process for the Isle Royale National Park Cultural Resources Management Plan. The Park contains an irreplaceable collection of cultural resources including 19

historic districts and cultural landscapes, 140 National Register-eligible structures, 4 lighthouses, over 100 archeological sites, thousands of artifacts, fishing and recreational camps, and many largely undocumented ethnographic cultural resources, traditions and practices.

Alternative B is clearly the alternative among those described that would be the least harmful to historic resources. All other alternatives would result in the loss of valuable aspects of the Park's heritage, contrary to the Park Service's conservation responsibilities under applicable federal law. However, we are troubled by the Park Service's unwillingness to consider the option of renewing any existing special use permits and leases. As a result, this alternative is improperly foreclosed.

Interests of the National Trust for Historic Preservation

The National Trust for Historic Preservation was chartered by Congress in 1949 as a private nonprofit membership organization for the purpose of furthering the historic preservation policies of the United States and facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. 468. The National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.

In addition, the National Trust has recently released a study entitled Historic Leasing in the National Park System: Preserving History Through Effective Partnerships (Sept. 2013) (see www.preservationnation.org/information center / saving-a-place/ public-lands ;resources /NTH P-N PS-and-HistoricLeasing-

FINAL.pdf). As a result, we have an important national perspective to share on the use of public-private partnerships to leverage the resources available for the maintenance and preservation of historic properties in the National Parks.

### Administrative Background

The Park's Newsletter #2, published in November 2013, introduces four alternative concepts the Park is considering for future stewardship of its historic resources and invites public comment. The outcome of these discussions will frame the agency's alternatives analysis in an Environmental Impact Statement, pursuant to the agency's obligations under the National Environmental Policy Act. In addition, the Park is concurrently conducting consultation as part of its obligation to comply with the National Historic Preservation Act. The National Trust participated by telephone in the most recent Section 106 consultation meeting on November 21, 2013. We would appreciate the opportunity to continue to participate in the process as a consulting party, pursuant to 36 C.F.R. 800.2(c)(S) and 800.3 (f) (3).

The Park Service Has a Legal Mandate to Conserve Historic Objects Within its Jurisdiction

Since its inception in 1931, Isle Royale National Park has been managed in accordance with the National Park Service's Organic Act, which requires the agency "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." 16 U.S.C. 1, cited in 16 U.S.C. 403b (emphasis added).

When Congress designated over 99% of Isle Royale National Park as Wilderness and potential wilderness in 1976, that designation "did not lessen the National Park Service's obligation to preserve the island's character," as required under its Organic Act. Isle Royale Boaters Assn v. Norton 330 F.3d 777, 783 (6th Cir. 2003); see also Act of October 20, 1976, Pub. L. No. 94-567, 6, 90 Stat. 2692 (stating that the Park is to be managed "in accordance with applicable provisions of the Wilderness Act."). The Park Service's responsibility for stewarding "historic objects" in wilderness is preserved in Section 4(a) (3) of the Wilderness Act, which states that wilderness designation in any "park, monument, or other unit of the national park system" "shall in no manner lower the standards evolved for use and preservation" of the place in accordance with acts of Congress that pertain to or affect the areas. 16 U.S.C. 1133(a) (emphasis added).

In addition, beyond maintaining the protections required by other federal laws, the Wilderness Act itself affirmatively requires the National Park Service to manage and preserve historic resources in wilderness. Section 4

charges all wilderness management agencies to preserve wilderness character for six specific public purposes: recreational, scenic, scientific, educational, conservation, and historical use. /d. at 1133(b) (emphasis added). Recently, the 9th Circuit Court of Appeals made clear that Congress' intent is ambiguous as to how these purposes relate to other Wilderness Act goals and that courts should afford deference to an agency's judgment as to how historical use is to be preserved. Wilderness Watch v. U.S. Fish and Wildlife Service, 629 F.3d 1024 (9thCir. 2010). The court noted that the "competing instructions" in the Wilderness Act "call for the application of judgment and discretion." Id at 1033. Based on these authorities, the Park Service not only has ample basis for stewardship of the historic properties within the wilderness it manages, it has the legal mandate to do so.

Support for Conditional Use of Historic Resources Through Partnerships

The vast majority of the 140 historic structures in Isle Royale National Park in need of active management are located in a very small area of "potential wilderness" comprising just 231 acres. In comparison, the Park manages 131,880 acres of designated wilderness.1 In light of the fact that a very small amount of land contains a majority of the Park's historic structures, we feel it is entirely reasonable to focus maintenance at all of these sites on historic resource conservation needs in accordance with the Organic Act and Wilderness Act mandates. We suggest that the Park assure that by using a "minimum tools" analysis when authorizing repairs, the maintenance activities will also be consistent with potential wilderness values.

The focus in Alternative B on the use of partnerships to ensure the preservation of resources is a promising step. Many National Park units around the country have had great preservation successes through the use of partnerships, and Isle Royale has the opportunity for similar successes by enlisting the help of interested preservation partners.

Through thoughtful use of leasing and other authorities, the Park Service can ensure that leases or cooperative agreements conform with Wilderness Act mandates by putting in place strict conditions for the operation and use of properties. By keeping the historic structures in active use, the Park Service can avoid the neglect and damage - and often the ultimate loss of the resources- that often comes when historic properties sit vacant or underutilized. And, by creatively using these tools to balance historic preservation and wilderness conservation needs, the Park Service can better ensure that these unique historic resources are available for future generations of park visitors to enjoy.

In light of this, we are troubled by the Park Service's statement on page 4, which we believe improperly forecloses the alternative of renewing existing leases, special use permits, and volunteer-in-park agreements: Private Residential Use of Cabins. Upon expiration, life leases and special use permits authorizing private residential use of publicly owned summer cabins and commercial fishery bases will not be renewed or extended. Similarly, volunteer-in-park agreements issued to families during the development of the CRMP will end. The National Park Service may seek a variety of partnerships and opportunities for cooperation with local communities, government agencies, nonprofit organizations, and other entities that have an interest in helping to implement this plan.

Alternative B calls for the establishment of "partnerships." But the Park Service has already decided, without consultation, that all existing partnerships will be terminated. These are relationships that are based on generations of traditional cultural use and maintenance of these historic properties. As a result, the agency would have to start from scratch to find new partnerships for 140 historic properties. The predecisional termination of all of these uses makes it very unlikely that new relationships and new uses can be found for all 140 properties, and dramatically increases the risk that many, if not most, of the historic properties will have to endure a winter in a vacant, unmaintained, and deteriorating condition.

If the Park Service believes that current law requires the termination of these relationships, then the National Trust would support an effort by the Park Service to seek congressional clarification that these leaseholds and special use permits are not only authorized but affirmatively promote the public interest in protecting historic resources by bringing in private contributions to enhance and leverage public dollars.

### Conclusion

In closing, Alternative B is clearly the least harmful alternative among the options defined in the initial CRMP document, because it would preserve the highest number of historic properties. All other alternatives under consideration are inherently and unacceptably flawed due to their failure to adequately preserve historic resources as required under federal law. In addition to Alternative B we urge the Park Service to add an alternative that would include a process for renewing previous leasehold and permit relationships.

Thank you for the opportunity to comment on this important matter. We look forward engaging further as the planning process moves forward.



Correspondence ID: Received:

144 Project: 33691 **Document:** Dec,17,2013 00:00:00

**Correspondence Type:** 

Letter

Correspondence:

1. They seem well thought out and cover a large range of activities and historical themes. Each one different in there final goals. And each one appealing to different group of people. Being that I am a sailor, Alternative C is more appealing but that not the one I'd choose because there is so much more for the island to offer.

2. I like Alternative B because it covers more of what the island has to offer.

**Correspondence ID:** Received:

145 Project: Dec.17.2013 00:00:00

33691

**Document:** 

55915

55915

Correspondence Type: Correspondence:

Letter

1. We appreciate the intentionality behind the effort- not just taking the path of least resistance. And we greatly appreciate including us- the users-in the process.

We are greatly invested in Isle Royale!

- 2. It was difficult to understand the differences. Too verbose! Also I assume some alternatives cost more than others, so choices must be made. With a sense of expenses, we could prioritize better. We always visit the Minong Mine, Suzi's Cave, the "America" underwater (by kayak) and we love the visitor center at Windigo.
- 3. Given limited resources, we believe climate change issues are huge and will only grow in the next few decades. While this is not directly connected to "cultural resources", we think it will affect everything and should be addressed in the plan. For instance, asking the question: "How will climate change affect our management of cultural resources? Are some more fragile? How can our educational tools of cultural artifacts teach our visitors about climate change?"
- 5. Thank you for all you do! FYI somehow you lost Cindy Crosby, a range at Windigo who was an outstanding teacher for our groups of all ages. She taught us more about Isle Royale... our Windigo experience has gone significantly down in quality learning since she left. If there's any way to get her back...

55915

Correspondence ID: Received:

33691 146 Project: Document:

Dec,17,2013 00:00:00

Letter

**Correspondence Type:** Correspondence:

- 1. The concepts presented in the draft document cover a variety of scenarios.
- 2. Option "B" is my preferred option because it covers the broadest variety of cultural uses of the island/region. It does not favor one time period or cultural group over another, and allows for the broadest interpretation of cultural resources, both now and in the future.
- 3. As much as possible, the diverse cultural resources- representing the many uses of Isle Royale by different cultural groups in various time periods- should be preserved. Ideally, these cultural resources would also be interpreted for visitors and others, using a combination of available material culture, oral histories, and archival material.
- 4. In addition to preserving the evidence of past cultural activity on (and around) Isle Royale, substantial efforts should go into making this information available to visitors, researchers, and the general public. In particular, photographic, written, and recorded (audio/visual) information should be made available on an interpretive website, using, for example, timelines, images, and recordings to interpret the various cultural uses of the island. Also, the archival material should be disseminated in digital databases such as ArtStor, HathTrust, or other accessible, searchable, databases.

The creative potential of students and others could also be tapped by encouraging the creation of interpretive apps that would enhance the experience and understanding of Isle Royale's cultural heritage. Similarly, projects benefiting from the contribution of "citizen scientists" could be coordinated with the goal of making the cultural resources of Isle Royale better known and more widely understood.

5. Option "B" as well as the additional outreach/collaboration mentioned above, would require a dedicated administrative effort in perpetuity. While these administrative roles can efficiently harness the efforts of volunteers and students, these administrative positions are the ones that seem to suffer the most from funding cuts. If Option "B" (or a variant of it) were to be implemented, this would require a sustained effort to maintain the necessary administrative positions that would make this option possible.

Correspondence ID:

147 Project: Dec,19,2013 00:00:00 33691

**Document:** 

55915

Received:

Correspondence Type:

Letter

Correspondence:

2. Plan A: the island should be left as is and let nature do its work for all visitors to explore.

**Project:** 

33691 **Document:** 

**Correspondence ID:** Received:

148 Dec,31,2013 00:00:00

Correspondence Type: Correspondence:

Letter

Concerning the cultural resources management plan for the national park- Isle Royale-

Remove the moose and wolves from Isle Royale to the main shore of Lake Superior.

**Document:** 

There is not enough natural food to support the moose or the wolves. Both the moose and wolves are starving to death.

Thank you



Correspondence ID:

Received:

149 **Project:** Jan,06,2014 00:00:00

33691

55915

**Correspondence Type:** Correspondence:

Letter

- 1. I like that you have a broad spectrum of alternatives, from "Do Nothing" to a development of many "resources". I don't like that the alternatives don't include more for user groups like kayakers.
- 2. Alternative A- I like that "Wilderness Park" seems to be emphasized more and development of historical resources less.
- 4. I would like to see more documentation and interpretation of Native American sites. I think that these sites are appropriate for study in a wilderness park. The wolf study is another appropriate study to be continued.

Correspondence ID:

Received:

Project:

**Project:** 

33691

**Document:** 

55915

Correspondence Type: Correspondence:

Jan,06,2014 00:00:00

Letter

- 2. B. It seems it is the most "affordable" plan. It allows for further study and thinking.
- 4. Boat are rotting everywhere- Chippewa Harbor.
- 5. We have been to the Island a number of times. It seems "just right" to us. Not too crowded, varied, etc. But the deterioration of cultural sites is disturbing to a history major.

**Correspondence ID:** Received:

Jan,06,2014 00:00:00

151

33691

55915 Document:

Correspondence Type: Correspondence:

- 1. Do not feel the no-action alternative is acceptable as the NPS has not been able to address this issue well due to the cut back and other visitor [unreadable]. Definitely against A as the cultural resources on IR are important historically and should be preserved- as have already lost too many. C and D are too narrow in scope and as a diver would certainly be against "guided
- 2. Alternative B- I believe all cultural resources should be considered and not a priority placed on a specific one such as in C and D. Do believe partnerships are important as the NPS does not have the personnel or finances to address these issues as they deserve.
- 4. I believe the NPS should share more of these artifacts they have with the public. An example is the wheel of the Algoma was donated back to the park in 2011 and has not been displayed. I support a total ban on tearing down and destroying cultural resources as been a part the previous park history and I believe what is left should be preserved, repaired, what is needed.
- 5. I realize these comments will be received after the deadline. Do to moving and a delay in forwarding with some traveling

involved I just recently was able to review this plan and its alternatives.

**Correspondence ID:** Received:

152 Project: 33691 55915 Document: Jan,06,2014 00:00:00

Correspondence Type:

Letter Correspondence:

- 1. It clearly [unreadable] that you respect the public's opinion. It was all quite clear. And, as I have an interest in Isle Royale, I find it interesting.
- 2. I entirely agree with alternative A. The history of the island should be articulated by park staff through interpretive presentations. But the wilderness element of the island shouldn't be compromised.
- 3. Interpretive offerings should essentially be left to [unreadable] Rock Harbor and Windigo. The rest of the island should remain a place of wilderness- offering more [unreadable] exploration.
- 4. The [unreadable] artifacts were in [unreadable] condition when I observed them. I do hope that the condition of this [unreadable] remains in good conditions. It was a thing to see [unreadable].
- 5. I wish you the very best. Isle Royale is a true wilderness treasure. It should remain so forever.

Correspondence ID: Received:

Project: **Document:** 55915 33691 Jan,24,2014 00:00:00

Correspondence Type: Correspondence:

Letter

- 1. I like that in the "aggregate" the alternatives cover a broad spectrum of doing a little or doing a lot to manage/preserve IR's cultural resources. I do not like the No Action Alternative; there must be some level of proactive management of the cultural resources. Many times potential problem items are kept manageable with a proactive effort.
- 2. I keep coming back to Alternative B; My only concern is that it may prove too aggressive and assume a level of partnership support that may never materialize. However, it strives to maintian the most resources of the alternatives in keeping with Isle Royale's rich and varied history. I love history and wilderness. I think the Park should go for Alternative B even if it must be "scaled back" later.
- 3. Perhaps explore a limited number of tightly regulated corporate partnerships for funding that is needed to support alternatives that are more aggressive in nature, such as Alternative B. "Going Green" is a huge initiative with corporate America now. As long as corporations are not "allowed" to dictate policy, I think it could work: similar to PBS sponsors?
- 4. Alternative A: preserve main lodge house at Rock Harbor as a link to past vacation use of IR and a superb meditation spot for all range of visitors to the island.

Alternative C: Edisen Fishery: all the lighthouses- these are "bare" minimums as a link to IR's maritime history.

5. Although nice vantage points, I feel the fire towers are unsightly and not worthy of protection. I know one is used for scientific measurements but perhaps a less innocuous alternative exists?

Correspondence ID: Received: Correspondence Type: **Correspondence:** 

Project: 33691 154 **Document:** 55915 Feb,13,2014 00:00:00

Letter

- 1. I like that in the "aggregate" the alternatives cover a broad spectrum of doing a little or doing a lot to manage/preserve IR's cultural resources. I do not like the No Action Alternative; there must be some level of proactive management of the cultural resources. Many times potential problem items are kept manageable with a proactive effort.
- 2. I keep coming back to Alternative B; my only concern is that it may prove too aggressive and assume a level of partnerships support that may never materialize. However, it strives to maintain the most resources of the Alternatives in keeping with Isle Royale's rich and varied history. I love history and wilderness. I think the Park should go for Alternative B even if must be "scaled back" later.
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- 4. Alternative A: preserve main lodge house at Rock Harbor as a link to past vacation use of IR and a superb meditation spot for all range of visitors to the island. Alternative C: Edisen Fishery; all the lighthouses- these are "bare" minimums as a link to IR's maritime history.
- 5. Although nice vantage points, I feel the fire towers are unsightly and not worthy of protection. I know one is used for scientific measurements but perhaps a less innocuous alternative exists?

Correspondence ID: Received:

33691 55915 155 Project: **Document:** 

Feb,13,2014 00:00:00

**Correspondence Type:** Letter

1. It was an excellent overview of the alternatives. Correspondence:

- 2. Alternative C. I think that IR can sustain greater visitation in set-aside areas of the park, so that more people can experience the island on a less-intense scale.
- 3. I favor zones of use- with most of the island reserved for wilderness and pockets, perhaps up to 5% of the island, with more cultural visit and learning sites.
- 4. I can't think of one that doesn't deserve preservation. I have visited most of these sites and am highly interested in the human history of the island. The maritime history is also of particular interest, as you might have already guessed.
- 5. Don't let it all rot away. But for these sites that do decay too much, consider rebuilding imitations in the area about the RH lodge within easy hiking distance, say 1/2 mile or so.

55915

**Correspondence ID:** Received:

156 Project: 33691 Document: Feb,13,2014 00:00:00

**Correspondence Type:** Correspondence:

Letter

1. I like the Common Actions statement which sets the groundwork for all future considerations. It emphasizes the importance of increased protection of ethnographic resources as determined by consulting associated tribes, in particular, the Grand Portage Band of Lake Superior Chippewa. The statement also addresses the expiration of life leases and special use permits. With the determination to let these leases expire, it allows the Park to further fulfill it's designation as a wilderness area. All concepts have merit except the No-action Alternative. Rather than being a plan, it is an excuse to kick the can down the road and encourage crisis management.

- 2. The best points of the proposed plans:
- Alt A: Structures in designated/potential wilderness areas documented and either removed or let to deteriorate.
- Alt B: Partnerships to help preserve a variety of historic properties.
- Alt C: Active interpretation of maritime resources through demonstrations, educational opportunities, active participation.
- Alt D: Emphasize the Park's archeological resources.
- 3. It is my opinion, that by cherry picking the best points of each plan, a hybrid can be created from all options which address the Park's environmental and cultural mission. In order to achieve this I propose the following:

Designate a specific island(s) to house a collection of unique and important historic buildings from all over the island. These buildings can include everything from fisheries to cottages. A partnership of interested parties can determine how these buildings can be both moved and refurbished. This collection of buildings then become a "campus" where seasonal programs can be implemented. The park could partner with agencies both public and private to develop a "Nation Park Stewardship Educational Center". This concept invites all sorts of educational programming including historic preservation, archeological research, cultural camps, boat building and scientific environmental studies specific to Isle Royale.

Costs could be offset by charging the students/participants a fee which includes instruction and housing. CEU's could be offered through educational institutions. Internships could be available in lieu of tuition for services required for maintenance of the

The campus could have several programs going on at the same time which would encourage the exchange and sharing of stewardship ideals.

4. The main lodge building at Crustal Cove should be salvaged and refurbished. It would make a great class room capable of housing a large group. A log building can be dismantled log by log and transported. Also, any building capable of being transported from Tobin Harbor by barge that is in good condition and of historic importance.

Correspondence ID: Received:

33691 157 **Project:** Document: 55915

**Correspondence Type:** 

Correspondence:

- 1. Alternative A would allow nature to take its course and renew this area to natural habitat. Alternative B would expand energy and resources on sites that would naturally deteriorate.
- 2. I would prefer Alternative B, because it would be most easily sustained and provide opportunity to be less developed.
- 3. The transfer of ownership of land from nature communities to the [unreadable] should be [unreadable].
- 5, Provide opportunities to tribes to use hunting and fishing rights on the island.

Y **Correspondence ID:** 158 Project: 33691 Document: 55915 Private:

Received:

Mar, 24, 2014 00:00:00

Mar,05,2014 00:00:00

**Correspondence Type:** 

Letter Correspondence: [No text included- this letter was merely sent to update the mailing list with correct contact info]

55915 **Correspondence ID:** 159 Project: 33691 **Document:** 

Received: Mar,27,2014 00:00:00

Correspondence Type: Letter

Correspondence: 1. I like that it is conceded nothing is being done about the culture and history of "Minong", Isle Royale. It does not do any good to blame, but what is good is to search what we can and will do.

- 2. Cultural is a part of history. Truth hurts those who don't like truth. The victor writes the history. Cultural and history could and should be developed and implemented. Tourists and others should be educated, which will obviously, when done in a "positive tone", bring more to Isle Royale. Knowledge and people!
- 3. I think the timewise history of Isle Royale is left out. Why? History is done orally and written wise. When it is gone, it is gone. Whose fault? I have some knowledge of oral and written history of Isle Royale. I am willing to help, if asked.
- 4. I can explain why they didn't always winter there. What happened to their culture there? What is a "windigo". What causes it? Mizhibizhu, mizhibizi. Battles with tribes. Who? Lage groups went by canoe- stopped with offerings. They would "Ad di zo kay" tell legends in the winter. Life was wonderful there, but not when "old man winter" stepped in. Copper was guarded long ago. By whom? Was it included in treaties. Was it forgotten? When was it legally lost. Write it in a positive way. Open the door to "minong" morning, the Island- the good island, island of the berries, etc.